

## STCW Consultation Responses

IGF training requirements and Polar Code training requirements			
Do you have any additional evidence about the number of experienced seafarers who may be affected by the Polar or IGF Code requirements in general? (Referenced/Contained in MSN 1866 Amendment 1)			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	No	N/A - Thank you for your response.
Individual	Second Officer	No	N/A - Thank you for your response.
Organisation	Teekay Gas	No	N/A - Thank you for your response.
Individual	N/A	The Nautical Institute (NI) operates a Certification Scheme for Ice Navigators. We have evidence that indicates there is increasing demand for skills in this area. We also see an increase in ship numbers operating in these areas as reported in media.	N/A - Thank you for your response and additional evidence.
Organisation	Southside Marine Ltd	No	N/A - Thank you for your response.
Individual	UK CoC Holder	No	N/A - Thank you for your response.
Organisation	RNLI	No views as we do not operate in these areas.	N/A - Thank you for your response.
Organisation	Blackpool and the Fylde College	No evidence.	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	No	N/A - Thank you for your response.
Organisation	Honourable Company of Master	No	N/A - Thank you for your response.

	Mariners - People and Safety Working Group		
Organisation	Humber Maritime College	Humber Maritime College has had no enquiries related to this training; it may be assumed therefore to be low volume.	N/A - Thank you for your response.
Organisation	Shetland Islands Council	No	N/A - Thank you for your response.
Organisation	Maritime and Underwater Security Consultants (MUSC)	Not applicable to MUSC's training prospectus.	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	No	N/A - Thank you for your response.
Organisation	Nautilus International	We believe that the number affected at present will be quite small however this will grow significantly over time as the number of ships subject to both codes increases.	N/A - Thank you for your response.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>The number currently affected at present is quite small and generally limited to merchant seafarers working on scientific research ships – the British Antarctic Survey and National Oceanography Centre fleets (BAS and NOC both sit within the Natural Environment Research Council, which is part of UK Research and Innovation (UKRI)), for example.</p> <p>This number is currently expected to increase significantly over time as the number of ships subject to both codes increases due to the effects of climate change, particularly the effect of the</p>	N/A - Thank you for your response and additional evidence. The evidence presented concurs with the MCA's rationale to introduce this training for seafarers serving on these types of vessels.

		recession of Arctic ice on the navigability of the Northwest Passage, Northern Sea Route and Transpolar Sea Route.	
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Do you agree with the assumption that ship owners will pay for training courses for their seafarers?			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	No, typically we have a variety of sponsor and non-sponsored participants. Some companies may pay for training however others expect the seafarer to have achieve and be competent before hiring.	N/A - Thank you for your response.
Individual	Second Officer	Not all companies do in the current climate.	N/A - Thank you for your response.
Organisation	Teekay Gas	Yes, agree that ship owners should pay for training courses for their seafarers. This is a vital benefit that contributes to continual development and retention.	N/A - Thank you for your response.
Individual	N/A	Yes. For the most part we believe this is true for developed nations.	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	Yes	N/A - Thank you for your response.
Individual	UK CoC Holder	No, my current company, and the company before that, does not even pay for STCW refresher safety training courses. Companies with these vessels will state the courses are required in job adverts therefore you have to have the course to get the job. This limits opportunities for employment, similar to gas/oil/chemical endorsements, unless you start with a gas/oil/chemical company as a	N/A - Thank you for your response and additional evidence.

		cadet then getting an endorsement will be very difficult.	
Organisation	Honourable Company of Master Mariners	No. Often seafarers fund their own additional training to aid in career development and progression.	N/A - Thank you for your response.
Organisation	Blackpool and the Fylde College	Yes	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Yes	N/A - Thank you for your response.
Organisation	Humber Maritime College	No. Ship owners will initially look for staff who already have training. If a trained seafarer is found from, say, Eastern Europe then that seafarer will be employed to the exclusion of a UK seafarer. This applies across the board to all training not solely the updated STCW requirements.	N/A - Thank you for your response and additional evidence.

Organisation	Shetland Islands Council	Yes, The SIC is committed to develop all staff to grow our own qualified personnel as the ferries are crewed from the islands they serve, it has been proven that retention of staff is better when islanders are developed rather than trying to move new people to islands.	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	No	N/A - Thank you for your response.
Organisation	Nautilus International	No. Responsible employers do pay for their employees training costs but there are a significant number that do not. This is especially true for certificates that are subject to updating training as some employers see these costs as the seafarer's responsibility. When employers do pay training costs, these are often subject to clawback arrangements if the employee leaves the company within a certain period.	N/A - Thank you for your response and additional evidence.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>No. Whilst responsible employers pay seafarers' training costs there are a significant number that do not. The cost of update or refresher training is often seen by employers as the seafarer's responsibility. Although this affects Officers more as they are required to obtain more certification in order to work, it is also an issue for Ratings.</p> <p>There is a clear disincentive for shipowners to meet the cost of seafarer training under the 'low cost' employment model, which increasingly sees seafarers employed on 'voyage-only' contracts. This means that the employment relationship with the shipowner ends when the short-term period specified in the Seafarer Employment Agreement ends. Under a voyage-only contract, a seafarer has to re-apply to work, even if they wish to return to a job on the same ship on the same</p>	N/A - Thank you for your response and additional evidence.

		<p>route.</p> <p>Based on evidence gathered by RMT and ITF Inspectors, we believe that the use of voyage-only contracts is increasing on domestic and international shipping routes. As such, shipowners effectively shop around for the cheapest international crew to employ on voyage-only contracts, in order to avoid costs including costs associated with seafarer training.</p> <p>The intermediary function of crewing agents is also a problem in this context, as crewing agents when they are the employer are even less likely to meet seafarers' training costs and the burden falls, once again, on low paid seafarers.</p>	
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Do you agree with the assumption that there will be a growing demand for both Polar and IGF vessel CoCs? (Please provide any evidence regarding this assumption)			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	Yes we, City of Glasgow College, have request for polar courses and IGF already.	N/A - Thank you for your response.
Organisation	Teekay Gas	<p>Yes.</p> <p>a) Increased access to and expanding exploitation of polar natural resources</p> <p>b) Shrinking icecaps mean more use of polar routes</p> <p>c) Growing world fleet size of polar and gas vessels</p>	N/A - Thank you for your response and additional evidence.

Individual	N/A	The evidence from the previous response above leads us to believe there is an increasing demand.	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	Yes. Most ordinary trade routes can become congested, or affected by political issues etc. Plus, the Polar routes offer a shorter therefore economical route at times.	N/A - Thank you for your response and additional evidence.
Individual	Second Engineer	Yes, there are a growing number of LNG/IGF fuelled ships on order books of shipyards.	N/A - Thank you for your response and additional evidence.
Organisation	Bluewater Yachting (Palma)	N/A	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	Whilst there has been an increase in trans polar voyages and polar region operations over recent years, transits and operations in these areas are limited. It can be agreed that there will be some growth, but this is unlikely to be a high growth area.	N/A - Thank you for your response and additional evidence.
Organisation	Blackpool and the Fylde College	Yes	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	YES – recent publicised transits of the northern sea route cargo quantities and vessel numbers by Russian Federation indicate a growth in this transit in this region. BP have undertaken a transit in 2019.	N/A - Thank you for your response.
Organisation	Humber Maritime College	We have no evidence to support any demand at present.	N/A - Thank you for your response.

Organisation	DFDS A/S (UK)	No opinion	N/A - Thank you for your response.
Organisation	Nautilus International	Yes. It is anticipated that increased traffic in arctic areas and more stringent environmental regulations as a result of the IMO's GHG strategy will lead to an increase in demand for both Polar Code and IGF Certification.	N/A - Thank you for your response and additional evidence.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	Yes, for the reasons outlined above. The IMO's binding target of a minimum 50% emission reduction from global shipping by 2050 could also stimulate demand for both Polar Code and IGF Certification.	N/A - Thank you for your response and additional evidence.



### Clarifying the Definition of 'Seafarer'

**Do you agree that the following statement is a reasonable expectation? 'Privately owned yachts of 24 metres or over, not in commercial use, should meet the training requirements for a UK Certificate of Competence' (If not please provide any relevant information)**

<b>Organisation or Individual</b>	<b>Name of Organisation (If applicable)</b>	<b>Comment</b>	<b>MCA Response</b>
Individual Seafarer	Second Officer	Yes	N/A - Thank you for your response.
Individual	N/A	Yes	N/A - Thank you for your response.
Organisation	Teekay Gas	Yes	N/A - Thank you for your response.
Individual	N/A	Yes	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	Yes, as this defines a level of competency to operate these vessels safely.	N/A - Thank you for your response.
Individual	Second Engineer	Yes	N/A - Thank you for your response.
Organisation	Bluewater Yachting (Palma)	Yes	N/A - Thank you for your response.
Organisation	RNLI	N/A - Since all our vessels are under 24m, this will exclude RNLI crews from the definition of 'seafarer'.	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	The implementation of higher standards of competency for the private yacht sector should be encouraged. However, this should not be at the expense of commercial training by the erosion of standards. The development of such certificates of competency should be very closely aligned to the safety, navigation and operational requirements of STCW.	The requirements for pleasure vessels of 24m and over are outlined in MSN 1858 (Amendment 1) and MSN 1859 (Amendment 1) and are considered appropriate for this type of vessel. This route includes MCA written and oral examinations.

Organisation	Blackpool and the Fylde College	Yes	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Yes	N/A - Thank you for your response.
Organisation	Humber Maritime College	Yes	N/A - Thank you for your response.
Organisation	Shetland Islands Council	Yes, a recognised standard to help seafarers if they decide to change vessel type for employment would help.	N/A - Thank you for your response.
Organisation	Maritime and Underwater Security Consultants (MUSC)	Yes	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	Yes	N/A - Thank you for your response.
Organisation	John Percival Marine Associates/Holylake Sailing School Ltd.	We agree that the statement is a reasonable expectation.	N/A - Thank you for your response.
Organisation	Nautilus International	Yes	N/A - Thank you for your response.

Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	Yes	N/A - Thank you for your response.
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Do you have any evidence about the number of seafarers who may be affected by this?			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	No	N/A - Thank you for your response.
Individual	N/A	No	N/A - Thank you for your response.
Individual	Second Officer	No	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	No	N/A - Thank you for your response.
Individual	Second Engineer	No	N/A - Thank you for your response.
Organisation	Blackpool and the Fylde College	No	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	No	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety	No	N/A - Thank you for your response.

	Working Group		
Organisation	Humber Maritime College	Not directly. Discussions with crewing agencies dealing with yacht crew indicate that many seafarers are already certificated.	N/A - Thank you for your response.
Organisation	Maritime and Underwater Security Consultants (MUSC)	No	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	No	N/A - Thank you for your response.
Organisation	Nautilus International	No but we expect the number to be small as compliance would already be best practice.	N/A - Thank you for your response.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	No	N/A - Thank you for your response.

### MCA course approval procedure

The MCA, on behalf of the Secretary of State, approves training providers to run 'short courses' and 'long courses'.

- 'short courses' are provided by private enterprises and nautical colleges; and
- 'long courses' are only permitted to be run by nautical colleges.

These courses enable UK seafarers to undertake safety critical training and meet the competency requirements for a UK CoC. (Contained in MSN 1856 (Amendment 1) Annexes G-K, MSN 1865 (Amendment 1) Annex F, MSN 1866 (Amendment 1) Annex D and MIN 643).

If an MCA approved training provider was found to have major non-conformities that impact on safety, do you agree with the MCA introducing provision to allow the cancellation of a course/a training provider's approval?

If your answer to the above is yes, in what circumstances would you expect this to occur?

If your answer to the above is no, please detail why and what other recommendations you would propose instead?

Organisation or Individual	Name of Organisation (If applicable)	Yes / No	Comments	MCA Response
Individual Seafarer	Second Officer	Yes	If courses were found to be lacking in substance, and training establishments were found to be cutting down on the time allotted which I personally have found to be an issue.	N/A - Thank you for your response. The rationale and circumstances will be encapsulated within the guidance.

Individual	N/A	No	<p>No, the training provider should not be immediately cancelled, there should be a process in which feedback and remediation measures allowed for to address the non-conformities.</p>	<p>The MCA does not foresee a case where a training provider/course would be immediately cancelled. In extreme case(s), a course may be deemed necessary to suspend to protect the safety of those on the course(s).</p> <p>The MCA's intention, as per MSN 1856 (Amendment 1) Annex G, would be to work with approved training and education providers whose qualifications lead to an MCA CoC to ensure standards are maintained. If during the approval process the MCA were to identify major non-conformities, the course approval may be altered/suspended until these issues were rectified and the MCA would work with the approved provider to ensure the standards were remedied. The provision to cancel a course would be enabled, but this would only be used as a last resort.</p> <p>Similarly, for 'Short Courses' as per MSN 1865 Annex F the provision would enable the MCA, if there are major non-conformities during the process/audit, to either cancel or suspend the approval until improvement was evidenced and the standards met.</p> <p>Cancellation would only be considered as an option if the rectification of any major non-conformities were unable to be closed out within a clear plan and timeframe. Cancellation would be subject to an enquiry (an 'appeal process') as set out in the Statutory Instrument.</p>
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Organisation	Teekay Gas	Yes	<p>Yes, each training provider should be held accountable for maintaining standards.</p> <p>Non-conformance can happen anywhere in a business. It is not limited to one area of management.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>Improper record keeping</li> <li>No evidence of course attendance/checking prerequisites</li> <li>Falsification of documents</li> <li>Utilising unqualified instructors</li> <li>No evidence of continuous improvement based on course feedback</li> <li>Previous non-conformities not being closed out</li> <li>Out with certification renewal</li> </ul>	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Individual	N/A	Yes	Where an important safety matter is identified through inspection or a serious injury or death occurs.	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Organisation	Southside Marine Ltd	Yes	Not teaching to the criteria, poor or unsafe facilities, or handing out certificates of attendance. These courses are paramount to the seafarers safety onboard, therefore it's imperative that they are conducted as per the MCA approval.	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Individual	Second Engineer	Yes	I would expect this to occur, when there are repeated failures of the provider to adequately cover the required syllabus and achieve the required learning outcomes.	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.

Organisation	Bluewater Yachting (Palma)	Yes	N/A	N/A - Thank you for your response.
Organisation	RNLI	Yes	<p>This would seem to be a sensible action to maintain the standards of the qualifications, though I would prefer the phrase 'suspension' to 'cancellation'. I presume there would be an appeals process and a process for re-assessment to resume their training activity.</p> <p>Major safety critical non-conformities should result in an immediate suspension of the training provider's approval. Ideally, however, regular verification exercises should identify any weaknesses before they become critical and offer feedback to enable the provider to meet the accepted standards.</p>	<p>The MCA does not foresee a case where a training provider/course would be immediately cancelled. In extreme case(s), a course may be deemed necessary to suspend to protect the safety of those on the course(s). Provision for both scenarios is made in the Regulations.</p> <p>The MCA's intention, as per MSN 1856 (Amendment 1) Annex G, would be to work with approved training and education providers whose qualifications lead to an MCA CoC to ensure standards are maintained. If during the approval process the MCA were to identify major non-conformities, the course approval may be altered/suspended until these issues were rectified and the MCA would work with the approved provider to ensure the standards were remedied. The right to cancel a training provider's approval would be available, but this would only be used as a last resort.</p> <p>Similarly, for 'Short Courses' as per MSN 1865 Annex F, the provision would enable the MCA, if there are major non-conformities during the process/audit, to either cancel or suspend the approval until improvement was evidenced and the standards met.</p> <p>Cancellation would only be considered as an option if the rectification of any major non-conformities were unable to be closed out within a clear plan and timeframe. Cancellation</p>



				would be subject to an enquiry (an 'appeal process') as set out in the Statutory Instrument.
Organisation	Honourable Company of Master Mariners	Yes	<p>It is understood that the MCA has always had the ability to withdraw approval for courses and training establishments, and the purpose of their internal auditing system is to implement this.</p> <p>So, yes, where it is not presently available, the possibility to withdraw approval for a course and/or cancellation of a course should be implemented.</p> <p>Where the delivery of a course and/or assessment of a course fall below the required relevant standards against which the course should be delivered this should include standards of both learning elements of training and compromised safety of personnel on the courses.</p>	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Individual	OOW Engineer	Yes	Major non-conformities not corrected in an agreed time frame with MCA, should lead to cancellation of approval	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Organisation	Blackpool and the Fylde College	Yes	In serious breaches of H&S regulations and/or meeting the requirements of the training standards.	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.

Organisation	The Nautical Institute - Members	Yes	<p>The approved training facility continued to fail to meet expected standards after appropriate warning.</p> <p>Fraud and issuing of certificates when candidate has failed to meet required standard.</p> <p>Bribery and corruption.</p> <p>Major non-conformance is bad, but training centre should be given the chance to rectify and course approval returned if deemed closed out.</p>	<p>The MCA does not foresee a case where a training provider/course would be immediately cancelled. In extreme case(s), a course may be deemed necessary to suspend to protect the safety of those on the course(s).</p> <p>The MCA's intention, as per MSN 1856 (Amendment 1) Annex G, would be to work with approved training and education providers whose qualifications lead to an MCA CoC to ensure standards are maintained. If during the approval process the MCA were to identify major non-conformities, the course approval may be altered/suspended until these issues were rectified and the MCA would work with the approved provider to ensure the standards were remedied. The provision to cancel a course would be enabled, but this would only be used as a last resort.</p> <p>Similarly, for 'Short Courses' as per MSN 1865 Annex F the provision would enable the MCA, if there are major non-conformities during the process/audit, to either cancel or suspend the approval until improvement was evidenced and the standards met.</p> <p>Cancellation would only be considered as an option if the rectification of any major non-conformities were unable to be closed out within a clear plan and timeframe. Cancellation would be subject to an enquiry (an 'appeal process') as set out in the Statutory Instrument.</p>
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Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Yes	N/A	N/A - Thank you for your response.
Organisation	Humber Maritime College	Yes	Only after a demonstrable failure of management to correct any major non-conformity and after an appeal process.	<p>The MCA does not foresee a case where a training provider/course would be immediately cancelled. In extreme case(s), it may be deemed necessary to suspend an approval to protect the safety of those on the course(s).</p> <p>The MCA's intention, as per MSN 1856 (Amendment 1) Annex G, would be to work with approved training and education providers whose qualifications lead to an MCA CoC to ensure standards are maintained. If during the approval process the MCA were to identify major non-conformities, the course approval may be altered/suspended until these issues were rectified and the MCA would work with the approved provider to ensure the standards were remedied. The provision to cancel a course would be available, but this would only be used as a last resort.</p> <p>Similarly, for 'Short Courses' as per MSN 1865 Annex F the provision would enable the MCA, if there are major non-conformities during the process/audit, to either cancel or suspend the approval until improvement was evidenced and the standards met.</p> <p>Cancellation would only be considered as an option if the rectification of any major non-conformities were unable to be closed out</p>

				within a clear plan and timeframe. Cancellation would be subject to an enquiry (an 'appeal process') as set out in the Statutory Instrument.
Organisation	Shetland Islands Council	No	Some of the course required for ferries are not run very often by our local training provider and they often lose out on opportunities due to the approval lapsing, as long as there have been no significant changes to a course does it actually require to be assessed? The standard could be maintained some other way without requiring a surveyor to attend.	As per the STCW Convention and Code, it is a mandatory requirement for the MCA, on behalf of the Secretary of State and as the authorised Maritime Administration, to approve and monitor STCW 'Short' and 'Long' courses.
Organisation	Maritime and Underwater Security Consultants (MUSC)	Yes	It is clear that there are a number of instances where unsafe practices could be evident when carrying out practical training such as Firefighting and Sea Survival, but not strictly applicable to security (SSO/PDSD/PSA/CSO) and other theory-based courses.	The MCA acknowledge that while these instances may not extend beyond the practical STCW safety courses, other STCW courses (such as Ship Security Officer) are still required to be monitored and audited in line with the STCW Convention and Code requirements. These 'non-practical/safety' courses are still considered safety critical to the MCA.
Organisation	DFDS A/S (UK)	Yes	When the standard of training falls below that which will ensure that the safety content of the course is fully understood and that there is evidence that this is the case.	N/A - Thank you for your response. The proposed rationale and circumstances are covered within the current guidance.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	Yes	We would expect this to occur once all steps had been taken to correct any issues and after seeing no improvement.	<p>The MCA does not foresee a case where a training provider/course would be immediately cancelled. In extreme case(s), it may be deemed necessary to suspend an approval to protect the safety of those on the course(s).</p> <p>The MCA's intention, as per MSN 1856 (Amendment 1) Annex G, would be to work with</p>

				<p>approved training and education providers whose qualifications lead to an MCA CoC to ensure standards are maintained. If during the approval process the MCA were to identify major non-conformities, the training provider's approval may be altered/suspended until these issues are rectified and the MCA would work with the approved provider to ensure the standards were remedied. The right to cancel an approval, and therefore a course, would be available, but this would only be used as a last resort.</p> <p>Similarly, for 'Short Courses' as per MSN 1865 Annex F the provision would enable the MCA, if there are major non-conformities during the process/audit, to either cancel or suspend the approval until improvement was evidenced and the standards met.</p> <p>Cancellation would only be considered as an option if the rectification of any major non-conformities were unable to be closed out within a clear plan and timeframe. Cancellation would be subject to an enquiry (an 'appeal process') as set out in the Statutory Instrument.</p>
Organisation	Nautilus International	Yes	The circumstances listed as major non-conformities in Annex G of MSN 1856 (amendment 1) would in our view constitute reasonable grounds for cancelling a training providers approval. It is stated in Annex G that if approval was removed then cadets already on the course would be allowed to continue. This may not be an	The MCA's intention would be for any Long Course candidate affected by this provision to undergo an assessment of the underpinning knowledge / competencies they have learnt so far. The MCA would support them alongside other UK Nautical Colleges to enable them to finish their studies/cadetship. The MCA must ensure a minimum level of competency had been met, but the MCA would ensure that any

			appropriate course of action if students are being taught unsafe or incorrect techniques so we would suggest amending the wording to indicate that consideration would be given to allowing cadets to continue if appropriate.	short falls would be identified and work with the new college to develop a route to ensure the candidate could demonstrate the required competency.
Organisation	Ocean Technologies Group (Videotel and Marlins)	Yes & No	<p>Only where the acts or omissions of an approved training provider have directly caused an unacceptable level of risk to the safety of a person while they are under training or in the care of the training provider do we agree the MCA should consider this action.</p> <p>We do not agree that the 'potential endangerment of trainees while.....at sea' (Consultation Document, section 2.2) is acceptable grounds for course cancellation since acts and omissions that may compromise safety at sea may not necessarily be attributed directly or solely to approved training that has taken place previously. Subsequent interventions, such as rogue mentoring, company instruction or peer influence could have a greater causal impact on safety AFTER a trainee has completed training than the substance of the training itself.</p> <p>The MCA is therefore recommended to revise its wording to hold approved training providers to account only for their acts and omissions that severely</p>	The MCA notes the response and will clarify the wording around 'cancellation' in the relevant MSNs.

			impact on the safety of trainees while they are under training, not thereafter.	
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	Yes	The circumstances listed as major non-conformities in Annex G of MSN 1856 (amendment 1) provide grounds for cancelling a training providers approval for safety critical training for Masters and Deck Officers Certificates of Competency. It should also be made clearer that Deck Ratings seeking CoC qualifications are also covered by this protection against rogue training providers.	The MCA agree with the points raised and note that the proposed provisions and the MCA's approval process and requirements will apply to all MCA approved training courses/providers. This will ensure all UK seafarers are adequately trained in safety critical competencies as well as enabling the MCA to protect seafarers and those who they are responsible for, such as passengers by promoting and maintaining high quality training standards.

Does the new course/training provider approval process clearly define what the MCA expects from training providers to ensure the quality of training delegated to training providers? If not, how could it be improved?			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	Yes	N/A - Thank you for your response.
Organisation	Teekay Gas	Yes	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	Long Courses – additional major non-conformity issues of persistent academic malpractice that would be sanctioned by the academic institution.	The MCA agree with this response. Academic malpractice is included in the proposed guidance, MSN 1856 Annexes G to K and MSN 1857 Annexes D to H.

Individual	OOW Engineer	<p>I do not see much guidance on the following with regard to training providers:</p> <p>1) equipment, tools and facility requirements for different courses, example, EOOW courses.</p> <p>2) qualification requirements for instructors, for example, can a MSc in Marine Engineering holder who has an EOOW CoC teach Engineering knowledge General or Motor at Management level (Chief/Second)?</p> <p>3) What are the expectations for update training for instructors with regard to changing technology and regulations, for example, every two years or three years or whenever there is a major change to regulations.</p> <p>4) What are the topics to be covered in a training organisation exposition (i.e. the document that describes how a training organisation functions).</p>	<p>The MCA has published extended guidance within MSN 1856 (Annexes G to K) and MSN 1857 Annexes (D to H) for 'Long' courses and MSN 1865 (Annex F) and MIN 643 for 'Short' Courses. The courses must be mapped to the STCW Convention and Code, which detail further provisions and requirements, in order to obtain and retain MCA approval for the delivery of 'Long' and 'Short' courses.</p> <p>The published MCA approved guides also provide further details for training providers seeking MCA approval, which are reviewed and can be updated to reflect changes.</p>
Organisation	Blackpool and the Fylde College	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Yes	N/A - Thank you for your response.



Organisation	Humber Maritime College	<p>The new guidance is substantially better than before. There are two areas which may be improved:</p> <p>1) ensure that IAMI / representative bodies are involved in an ongoing review of auditing standards.</p> <p>2) Ensure consistency of application across the UK; MCA offices need to be aligned to the same standards over the short term and MCA officers need to be trained to undertake the role.</p>	<p>Only the MCA, on behalf of the Secretary of State and as the responsible Maritime Administration, can undertake the auditing process and ensure the robustness of the UK Seafarer training system (as per the STCW Convention and Code). The MCA, as the independent regulator, will work with industry where possible to maintain and improve the standards of UK seafarer training but this cannot create a conflict of interest.</p> <p>Along with the published MSNs/MINs, internal procedures and guidance will be amended to reflect the 2021 amendments. This will enable a higher level of consistency and collaboration between MCA Offices on 'Long' and 'Short' courses.</p>
Organisation	Shetland Islands Council	The STCW and OPITO courses which are exactly the same for example FRB or FRC.	The MCA works with maritime stakeholders to create courses that meet the requirements of STCW and industry. Where a course meets the required STCW standards, an STCW certificate can be issued. This is irrespective of whether it is a standalone OPITO course or an STCW course.
Organisation	DFDS A/S (UK)	In combination with the STCW Code the standards should be clearly understood.	N/A - Thank you for your response.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	We believe that the new course and training provider approval process does clearly define what the MCA expects.	N/A - Thank you for your response.
Organisation	Nautilus International	Yes	N/A - Thank you for your response.

Organisation	Ocean Technologies Group (Videotel and Marlins)	<p>The MCA should develop checklists and supporting guidance on its quality expectations (beyond mere bullet points) specific to the type of delivery a course is approved for. Training designed and delivered solely via learning is an entirely different process and paradigm to that for face-to-face delivery, yet course criteria and M notices are mostly framed around the latter. The consequence is that surveyors go looking for a 'face to face equivalence' when in fact it simply does not apply or exist in the e-learning world.</p> <p>For example, minimum contact hours in a classroom is an irrelevant question to pose when approving e-learning as learning outcomes (not inputs) drive the time spent onscreen. Whether it takes 2 or 20 hours to reach the learning outcomes matters not. MCA is recommended to sit with and learn from e-learning training providers to drive quality expectations around e-learning</p>	<p>In line with Maritime Skills Commission report and the MCA's strategic plan, the modernisation of seafarer training and the process to enable these changes are contained in the proposed guidance. The MCA are, and will continue to, constantly review this, along with the MCA approved guides, to ensure a flexible approach as technology and seafaring evolves. (For example, MIN 643 can be updated along with the MCA approved guides to reflect future changes to STCW Short Courses or clarification on MCA 'Short' course policy). Updated and clear guidance will also be available to MCA staff to reflect modernised or alternative methods of learning and assessment for MCA approved courses.</p> <p>The MCA believes the point regarding minimum contact hours can be applied to 'Long' courses. However, for short courses the contact hours are minimum hours to achieve the set standard. If these minimum standards are not met or evidenced, then there is a risk of inconsistency across MCA approved training providers and an inability to monitor the course structure.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	Yes	N/A - Thank you for your response.

Simulator time in lieu of seagoing service				
Do you support the proposal to allow the use of structured and approved simulator time in lieu of some of the seagoing service requirements for a Deck Officer's first CoC? (Contained in MSN 1856 (Amendment 1)). (Please provide any relevant evidence)				
Organisation or Individual	Name of Organisation (If applicable)	Yes / No	Comment	MCA Response
Individual Seafarer	Second Officer	No	As an officer who has only qualified within the past 18 months, I already believe the 12 months seetime to be insufficient. The depth of knowledge required, not least the experience required, especially on deck currently requires the full 12 months, if not more. Simulator time cannot replicate the entire experience of being on a vessel.	The MCA acknowledges the response. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.
Individual	N/A	Yes	On occasion, whilst onboard cadets do not always achieve the same standards of training or come across certain difficulties, the simulator would allow for this.	N/A - Thank you for your response.
Organisation	Teekay Gas	No	<p>No. Simulator time cannot be compared with experience gained with on-the-job sea time. We can train 2 weeks a year in a simulator but we cannot replicate experience. Actual STCW sea time requirements have been reduced far too much.</p> <p>In addition a cadet does not solely learn about navigation. A major part of any junior officers workload is maintenance, cargo operations, conducting risk assessments, operating equipment,</p>	<p>The MCA acknowledges the response and additional points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The MCA intends to carry out the pilot project,</p>

			<p>passage planning etc which cannot be done in a simulator.</p> <p>For ships that are on regular trade patterns, getting used to those passages and ports is critical, for future time on board. We need to have our cadets used to real life pressure and decision making.</p> <p>Not all simulator training is bad. For example a short simulator course to allow cadets to see what can be expected from a bridge team in phase one before going to the sea phase could be beneficial to practice COLREGS and buoyage however this should be to simulate real life rather than replace it. There should be no reduction in sea time for use of a simulator.</p>	<p>considering the simulator time equivalence in lieu of 1 month sea service only.</p>
Organisation	Scottish Maritime Academy at North East Scotland College	Yes - 1 month only	<p>Simulator exercises would be a good idea for enhancing seetime for Cadets, ensuring more variety across different vessels and navigational scenarios to improve training experience and knowledge bank.</p> <p>Interested to find out how this could be formally implemented by nautical colleges, and keen for involvement in any pilot scheme wherever possible. From personal experience, quality seetime is more than just about navigational exposure on the bridge,</p>	<p>The MCA intends to scale back the sea time allowance to up to 1 month maximum. This provision can then be reviewed in the future depending on the effectiveness of the results from the pilot project.</p>

			which is why a maximum 1-month replacement option would be most appropriate for teaching dedicated technical elements only.	
Individual	N/A (Nautical Institute)	No	<p>The evidence provided through workshops and webinars indicates the Cadet Bridge time on the simulator will be undertaken as a group of cadets. Allowing a group of unqualified personnel running a bridge operation bears no reality to real watchkeeping. It certainly bears no comparison to how airline simulation training is conducted. Of course simulation time is excellent for learning but should be in addition to the workplace experience – not instead of it.</p> <p>Seagoing service is not all about time spent on the bridge. Anchoring, cargo work, navigation, safety drills, sleeping, managing crew and personal shipboard relationships are all very important.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Organisation	Southside Marine Ltd	Yes	Yes, as a large part of the seetime is wasted or limited experience gained, such as long periods at anchor or open sea. The structured simulator time allows the delegate to experience situations with increased pressure and be able to manage these decisions effectively. This is paramount to the delegates progression and competency.	N/A - Thank you for your response.

Individual	Second Engineer	No	<p>No. While I agree that simulators are a great learning tool and able to place the cadets in high stress situations that can't be safely replicated onboard. They should be used to enhance existing training, not replace it. Seetime as a cadet is about more than just the physical act of watchkeeping. There's being used to watch patterns, learning how to stay away on the night watches, being away from friends and family, doing chart corrections, working with multinational crews, dealing with radio traffic which the operates first language is not English. These are all things cadets need to gain experience of and get used to. By potentially removing 2 months of sea time (120 watches) to be replaced with 20 days (35 watches max) in a simulator which would be during normal college hours would provide less time for a cadet to become used to a life at sea.</p>	<p>The MCA acknowledges the response. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The MCA intends to carry out the pilot project, considering the simulator time equivalence in lieu of 1 month sea service only.</p>
Organisation	RNLI	Yes	<p>Although this does not apply to the RNLI, we have used a combination of simulator and 'at sea' training for some years. We believe they complement each other and that an appropriate balance of the two forms of training can provide good results. Simulators permit focussed training in different conditions and specific scenarios that can accelerate the natural 'at sea'</p>	<p>Thank you for your response and comments regarding the potential benefits of using Simulators for seafarer training.</p>

			experience but should not totally replace 'at sea' training.	
Organisation	Honourable Company of Master Mariners	No	The proposal, as currently presented, is not able to be supported by the Honourable Company of Master Mariners. Our full reasoning for this response is to be found in Annex 2 of the HCMM letter dated 05 August 2021 to which this form is appended.	Please see below for the full response on the points raised.
Organisation	Blackpool and the Fylde College	Yes	<ul style="list-style-type: none"> <li>• We have contributed fully to the recognised MNTB/MCA short course criteria approval process and fully support this proposal from a pedagogical perspective.</li> </ul>	<p>The MCA acknowledges and thanks you for your response.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• The IMO has determined approved simulation training as a method for demonstrating competence and as educationalists we believe simulation is a powerful learning, teaching and assessment tool when used correctly.</li> </ul>	
Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• The question is, where is the best place for seafarers to learn and demonstrate that competence in a safe structured learning environment, with support from appropriately qualified and experienced lecturers.</li> </ul>	
Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• With concerns over the quality of sea time a standardised approach to learning, teaching and assessment will improve the quality of training programmes overall.</li> </ul>	

Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• A number of scenarios can be simulated, which may or may not be encountered by a cadet during their 12 months sea time. Experience gained on short courses, such as firefighting, can be placed into the context of watchkeeping.</li> </ul>	
Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• One recent comment from a Phase 5 cadet “I have learnt more in the simulator in a morning about manoeuvring than in all my time at sea” says it all.</li> </ul>	
Organisation	Blackpool and the Fylde College		<ul style="list-style-type: none"> <li>• The M Notice, or MNTB short course criteria, may need to identify the specific class of simulators approved for delivery of the part one and part two learning outcomes, as “full mission” is not clear. E.g.: DNV Class A/B/C.</li> </ul>	
Organisation	The Nautical Institute - Members	No	<p>No - Sample remark:</p> <p>Whilst simulator training is a valuable tool in providing seafarers with the basis of dealing with circumstances they will encounter at sea, in various fields, even with the current level of technology, it cannot replace experience of the 'true' environment they will encounter. Further reductions in sea time should be resisted. Sea time is fundamental to the seafarer’s ability to cope with challenges met at sea, not in the classroom.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>



Organisation	Honourable Company of Master Mariners - People and Safety Working Group	No	<p>No - The Deck officers seagoing training period prepares them for the duties and responsibilities expected of them outlined in the requirements of the MCA certificate that will be attained. Specifically, the seagoing period allows them to undertake practical seamanship and duties associated with leading others in a marine environment, in short that can physically DO what they will be asking others to do in the future. To experience and undertake the work is a recognised education tool used in development of competence.</p> <p>Simulator training may underpin some aspects of the Deck officer duties in navigational skills and collision avoidance, however is not supportive of the responsibilities that the Deck officer has with regard to the vessels marine operations, cargo operations and general seamanship. It is in these years that the individual experiences scenarios which will place them in a position to be able to lead in the future. Value of these opportunity's is extremely detrimental to the education of the profession.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
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Organisation	Humber Maritime College	Yes	Yes. However the recent Maritime Skills Commission report placed an emphasis on much greater use of simulation to supplement onboard training and a wider review will likely soon be underway. Regulations need to be flexible to ensure that future change can be made in a timely manner.	<p>The MCA agrees with the provision and need to be flexible to enable modernisation and future changes. The proposed guidance will enable the provision to amend to meet the needs of seafarers/industry.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Organisation	Shetland Islands Council	No	Simulator time is expensive and unless an accurate model only provides limited experience.	<p>The MCA acknowledges the response. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Organisation	Shetland Islands Council	No	No, we can provide sea service onboard our ferries.	N/A - Thank you for your response.
Organisation	Maritime and Underwater Security Consultants (MUSC)	N/A	Not applicable to MUSC's training prospectus.	N/A - Thank you for your response.

Organisation	DFDS A/S (UK)	Yes - 1 month only	Good quality, properly assessed, simulator training is a very valuable resource for training cadets. However, the existing length of Sea Time requirements is already a very short time for young people to assimilate to a life at sea. If simulator training was used as a substitute for sea time it should be for a maximum of one months reduction.	The MCA intends to scale back the sea time allowance to up to 1 month maximum. This provision can then be reviewed in the future depending on the effectiveness of the results from the pilot project.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	Yes	We do support the proposal to allow the use of structured and approved simulator time in lieu of some seagoing service requirements.	N/A - Thank you for your response.
Organisation	Nautilus International	Yes - 1 month only	<p>Nautilus supports the findings and recommendations of the Maritime Skills Commission Cadet Review Report, in particular those referring to the need to modernise UK seafarer training and improve the consistency of the training experience.</p> <p>We therefore cautiously support the proposal to implement a pilot project to determine if the proposals are able to enhance the learning experience of cadets whilst ensuring that the levels of knowledge and competence of cadets who follow this programme are at least equivalent to those qualifying under present arrangements. This support is based on the assumption that the trial is conducted as part of an open and transparent process with criteria for</p>	<p>The MCA agrees with the provision and need to be flexible to enable modernisation and changes.</p> <p>The MCA intends to scale back the sea time allowance to up to 1 month maximum. This provision can then be reviewed in the future depending on the effectiveness of the results from the pilot project.</p> <p>Further, the points that you have highlighted will be considered as part of the pilot project. Additional guidance will be created and published with input from stakeholders.</p>

			<p>success or failure clearly defined at the outset. We would also expect that social partners would be updated at regular intervals and given the opportunity to provide feedback.</p> <p>We would not support the results of the pilot project being used to justify a reduction in sea-time beyond one month. If the results of the pilot project show that a one-month reduction in return for 10 days simulator time is successful, then it does not necessarily follow that two months reduction for 20 days will be more successful. This is especially true as the Bridge Watch Keeping Simulator course that has been approved by the MNTB contains 10 days simulator time. There is currently no criteria for what would be taught and assessed in any additional simulator time used for further reduction of sea-time.</p> <p>With the information available at present, we would not support any reduction beyond the one month that is currently subject to the outcome of the pilot project and believe that any further proposal would need to be justified by additional research.</p>	
Organisation	United Kingdom Maritime Pilots Association	No	No. Sea time does not solely comprise of watchkeeping duties on the bridge but encompasses various training onboard	The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the

			<p>which includes cargo handling, SOLAS regulations/requirement and associated maintenance, anchor work and other Merchant Shipping Regulations. All of which cannot be replicated by time in a simulator. In addition, simulator time would have to encompass 30 days to allow for 1 month sea going time. On the basis of a 5-day week at a training establishment, this would turn into a 6-week course which defeats the object.</p>	<p>proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Individual Seafarer	Master Mariner	No	<p>Sea service for deck officers have already been reduced to bare minimum when following a structured Education &amp; Training programme (OOW from 36 months to 12 months) &amp; similar reduction for Chief Mate/Master. This bare minimum should not be sacrificed in the name of simulator training; rather further simulator training should be added to enhance the learning process along with minimum STCW'78 (as amended) stipulated practical seafaring time</p>	<p>The MCA acknowledges your response. Any future course of action will be decided following the result of the pilot project.</p>

Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	Yes	<p>RMT support the proposal for the MCA to pilot the use of simulator training time for cadets in lieu of one month sea going service, which is in line with the findings and recommendations of the Maritime Skills Commission Cadet Review Report published in June this year.</p> <p>This pilot must be handled, however, with caution. As part of this, we believe that the results of the pilot scheme should be subject to another consultation with seafarer trade unions and other stakeholders before any legislative changes, if any are made to the UK's current requirement for the sea time component which affect Ratings or Officers.</p> <p>Like our sister maritime union Nautilus International, RMT would not support the results of the pilot project being used to justify a further reduction in sea-time beyond one month.</p> <p>No regulatory equivalence should be drawn between the results of the pilot and autonomous shipping.</p>	<p>The MCA agrees with the provision and need to be flexible to enable modernisation and changes.</p> <p>The MCA intends to scale back the sea time allowance to up to 1 month maximum. This provision can then be reviewed in the future depending on the effectiveness of the results from the pilot project. The results will be monitored and evaluated throughout the duration of the project and intention would be to share/publish accordingly.</p> <p>Further, the points that you have highlighted will be considered as part of the pilot project. Additional guidance will be created and published with input from stakeholders.</p> <p>The use of autonomous vessels and regulations fall outside of these amendments and therefore would not form part of this amendment. Any future changes to the seafarer and training regulations would follow the standard procedure and include the necessary steps such as input from industry and consultation.</p>
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**Can you provide the cost and/or benefits this could have to you and/or your seafarers, associated with this change? (Please provide any relevant evidence)**

Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Organisation	Teekay Gas	There would be no benefit. College costs may actually increase to conduct such courses. Cadets are paid continuously during the sea phase hence there would be no additional expenditure to keep them on board our vessels.	<p>The MCA acknowledges the points raised. The use of Simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>
Organisation	Southside Marine Ltd	No	N/A - Thank you for your response.
Individual	Second Engineer	While simulators have benefits, modernising the training program like this will have a negative impact as detailed above. (They should be used to enhance existing training, not replace it. Seetime as a cadet is about more than just the physical act of watchkeeping. There's being used to watch patterns, learning how to stay away on the night watches, being away from friends and family, doing chart corrections, working with multinational crews, dealing with radio traffic which the operates first language is not English. These are all things cadets need to gain experience of and get used to. By potentially removing 2 months of sea time (120 watches) to be replaced with 20 days (35 watches max) in a simulator which would be during normal college hours would provide less time for a cadet to become used to a life at sea.)	N/A - Thank you for your response.

Organisation	Honourable Company of Master Mariners	<p>The proposal, as currently presented, does not provide any benefits to seafarers. The proposal achieves the opposite at unacceptable costs; it increases uncertainty in standards of training, uncertainty in international acceptance of United Kingdom (and Red Ensign) issued Certificates of Competency, implements direct discrimination in application between UK Cadets and Overseas Cadets and appears to attempt to strip away stakeholders' rights to have a say in future changes to training and application of STCW. Our full reasoning for this response is to be found in Annex 2 of the HCMM letter dated 05 August 2021 to which this form is appended.</p>	<p>The MCA note your opinion on the simulator training proposal. Please be advised that the other members of the REG group do not issue Certificates of Competency.</p> <p>The proposal is not discriminatory as it is applicable to all cadets. It is a safety-based approach and is being phased in, so will apply to UK cadets in the first instance. Thereafter, if the trial proves successful, it will apply to all cadets and will be extended to other routes, such as 'experienced seafarer'. The MCA will include a line in MSN 1856 Amendment 1 to clarify this.</p>
Organisation	Blackpool and the Fylde College	N/A for a College.	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	No	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	<p>The benefit would be to universities or colleges which have invested in Simulators which remain currently underutilised such as the Solent university.</p> <p>The real benefit would be in the provision of VR training simulation being provided at sea, in a marine environment rather than college-based simulation on a land-based environment.</p>	<p>The MCA acknowledges the points raised. The use of Simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>



Organisation	Humber Maritime College	<p>It is likely that the costs of providing simulation time will be of a similar magnitude to the overall costs of seetime provision to the shipping company, so there is likely to be likely overall impact to the industry.</p> <p>Costs of simulation are high, and colleges will need to recover costs directly with the ship owner.</p>	<p>The MCA acknowledges the points raised. The use of Simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>
Organisation	Shetland Islands Council	<p>Sim training was useful when the Azipods replaced rudders and props but limited use as model and software was poor and did not truly reflect the vessel.</p>	<p>For the simulator time in lieu to be accepted, it must be MCA approved and as noted in MSN 1856 Amendment 1 'All simulators used for the Bridge Watchkeeping Skills Simulator Course, must be approved by the MCA and must comply with the standards as per Regulation I/12 of the STCW Convention, 1978'. The simulator must be capable of simulating the operational performance capabilities of shipboard navigational equipment appropriate to the performance standards in STCW Regulation I/12 and sections A-I/12 and B-I/12. The instructors and assessors are also required to be qualified in accordance with the requirements of Regulation I/6 and section A-I/6 of STCW.</p>
Organisation	Maritime and Underwater Security Consultants (MUSC)	Not applicable to MUSC's training prospectus.	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	No	N/A - Thank you for your response.

Organisation	Nautilus International	<p>Nautilus believes that structured simulator time has the potential to enhance the cadet learning experience by providing the opportunity to experience scenarios that they might not be encountered during their sea phase training and could ensure that all cadets have been trained and assessed to the same minimum level.</p> <p>Nautilus' survey of newly qualified officers (published April 2021) showed that a majority (70%) felt that they would have benefited from more simulator training. However, feedback received since the simulator training proposals were announced has shown that a proportion of seafarers and ex-seafarers have significant concerns regarding the proposals to reduce the mandatory minimum sea service. There is therefore the potential for significant reputational risk if the pilot project is not carried out in the manner we have suggested above and if any reduction in sea-time is agreed to that cannot be fully justified by the results of the project.</p> <p>Feedback we have received from colleges indicates that the two weeks simulator training as proposed could be incorporated into the existing training programmes with little or no additional cost. If the outcome of the pilot project does not support the reduction of sea-time then consideration should be given to funding the simulator training without any reduction in sea-time</p>	N/A - Thank you for your response.
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		<p>consistent with the Maritime Skills Commission Cadet Report recommendation for government to cover 100% of the cost of cadet training.</p>	
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	The effect of this change on Ratings training would be minimal but would be significant for those with Watch duties.	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	<p>1. Legal Status of the MCA's communication to the IMO Secretariat (STCW.2/Circ/92). In July 2020 the MCA issued the above communication to the IMO. The communication infers that, as per the title, the equivalent arrangement concerning simulator training in lieu of sea time has been accepted and adopted in all regards by the UK Government, via the authority of the MCA. This communication created the opening for numerous press articles and announcements on the proposal. There is no indication within the communication that the changes to training and sea time remission were yet to be formalised in law (via consultation or the required changes to legislation and regulation), or that they were to be subject to</p>	<p>The letter was sent in order to comply with the obligation to notify the IMO as early as practicable of the details of the proposed equivalence. The equivalent arrangement is not yet in place and has always been subject to consultation (although there is no statutory duty to consult on an equivalence, the MCA was of the view that in this case it was appropriate to do so). As the MCA propose to introduce this equivalence, once the new regulations have been made, we will of course notify the IMO that the equivalence has been granted and that it can be found in MSN 1856 Amendment 1.</p>

running a pilot scheme. It is noted that statements within the communication indicate that at the time that the communication was issued, the MCA was in receipt of evidence to support the effectiveness of the courses that they had approved. This is a further incorrect statement as of the date of this letter; it is understood that the course has yet to be run as a pilot or otherwise, and at the present time no college has been authorised to run the course.

Additionally, indication is given that the course that has been approved by the MCA is for 20 days of simulator training, whereas HCMM is aware that the course that has been prepared is for 10 days training only, and at this time there is no concept or draft of a course for the second 10 day period. As STCW provides no guidance within the text of the convention on the status of communications, a query was raised with the Director of Legal Affairs at the IMO, Mr Frederick Kenney, on 17 September 2020.

The query raised was: "...the UK Government's recent communication to the Secretary General of IMO (ref: STCW.2/Circ.92) as issued by the Maritime and Coastguard Agency which is entitled "Equivalent arrangement accepted under Article IX of the International Convention of Standards of Training, Certification and Watchkeeping, 1978 (STCW), as amended". The HCMM has a keen interest

in the proposed changes to cadet training that is highlighted within this communication.

I would like to understand more about the nature of such communications (the text of STCW providing little insight into this). Could you possibly advise on how communications as these perceived by the IMO? Are these read as a supplement to the legal documents deposited when a Treaty/Convention has been ratified (ergo of a legal nature showing the binding intentions of the Member State), or is it the case that these are merely polite communications between the Member states?"

Mr Kenney advised in response on 28 September 2020: "With respect to the legal status of the communications received [from the MCA], the IMO Secretariat views them as communications fulfilling the obligations of the treaty by the Contracting State. With respect to the legal status of the content contained in a communication, that depends on the content itself, which is more a matter of domestic law than international treaty law. For example, if a Contracting State provides the Secretary-General with copies of its laws and regulations regarding a treaty, in fulfilment of Article IV-1-(a) of STCW, for example, that would have a different legal status domestically than a communication indicating that contact points for the validation of certificates had changed."

From the above guidance from Mr Kenney, the

contents of the communication appear more likely to fall into the former category of communications, in that it indicates changes to STCW training that have been adopted, and purports to point towards domestic legislation that supports this. As such the communication in its present form is likely to be considered as a communication “fulfilling the obligations of the treaty” and of a legal nature, rather than a mere communication of information.

The contents of the communication are very misleading. They are also very much at odds with the actual status of the course and the necessary regulatory steps that are required to be completed ahead of the implementation of such a change to what is a mandatory requirement of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978 as amended (“STCW”). At the time of this letter, it is understood that while the communication clearly contains errors in the status of the proposal, the communication has not been retracted by the MCA, nor has a verification on the contents of the communication been provided (save for a recent indication that it was indicated in the latest IMO audit that there were no Article IX equivalencies currently in use by the MCA). There is a possible argument that by depositing the communication with the errors contained therein, the MCA acted ultra vires.

Organisation	Honourable Company of Master Mariners	<p>2. The Dutch Model: Non acceptance by IMO, EMSA and other states.</p> <p>HCMM are aware that the Dutch Authorities submitted a similar proposal for Article IX equivalents to the IMO for onward transmission on 08 March 20002. The Dutch equivalents arrangement is the only one internationally that seeks to reduce seagoing service below the STCW minimum of 12 months for a Deck Officer of the Watch Certificate of Competency. This equivalent arrangement was only implemented by the Dutch Authorities after the completion of a number of research projects that were able to demonstrate to the satisfaction of the Dutch Authorities that standards would be able to be maintained. Such research has not been proposed or implemented to date for the proposal detailed within the Public Consultation. In 2018 the Dutch Authorities engaged Marin to review simulator training. This culminated in a report<sup>3</sup> (“Marin Report”). Within the report it is stated that the “Dutch view on replacing seagoing service requirements by simulator training is not yet fully accepted by EMSA/IMO” (author emphasis). This is the position in the Netherlands after the Dutch Model has been utilised for 20 years.</p> <p>Prior to the UK’s departure from Europe, under the provisions of EU Directive 2008/106/EC (as amended by Directive 2012/35/EU) and Directive 2005/45/EC, there was an agreement of reciprocity by Member</p>	<p>Dutch Certificates of Competency are accepted within the EU and by many other IMO Administrations. The MCA are unaware of any detrimental effect of including simulator time against the acceptance of Dutch CoCs. The UK’s proposal is a standalone proposal and is not linked to the submission of proposals by any other IMO members. The MCA agree the Dutch model should not be compared to the UK model. However, as in many areas, it is common for IMO members to share experiences and lessons learned from such initiatives. If the MCA believe it will add value, the MCA will speak to other IMO members when the trial is underway.</p>
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		<p>States to accept a Certificate of Competency (CoC) for issue of a Certificate of Equivalent Competency (CeC). This was a collective agreement within the European Union, and it is understood upon exit the UK reverts to a position where reciprocity of CoC for CeC is to be negotiated on a country-by-country basis. A risk therefore appears to arise where the UK adopts a change to Deck Officer of the Watch training that would lead to the issue of the CoC against criteria similar to the Dutch Model, that it is known to be not fully accepted by EMSA and IMO. This may in turn lead to reciprocity of CoC for CeC being unachievable should EU or other IMO Member States follow the guidance and observations that EMSA and IMO have made.</p>	
Organisation	Honourable Company of Master Mariners	<p>3. The Dutch Model: Reasons and Application</p> <p>It has been advised by the MNTB that the research undertaken for the development of the proposed courses includes reference to Royal Navy and Civil Aviation training. The MNTB, colleges and MCA have not, we understand, liaised with the Dutch Authorities on their training programme and the research available in the development of the proposed course. The Dutch Model for simulator training is markedly different to the changes put forward by MCA/MNTB. Dutch cadets have a front-loaded training whereby the majority of academic study is completed in the first 2 years of training, before any sea time is obtained. Some simulator training takes place before sea time, but this is within the second</p>	<p>Dutch Certificates of Competency are accepted within the EU and by many other IMO Administrations. The MCA are unaware of any detrimental effect of including simulator time against the acceptance of Dutch CoCs. The UK's proposal is a standalone proposal and is not linked to the submission of proposals by any other IMO members. The MCA agree the Dutch model should not be compared to the UK model. However, as in many areas, it is common for IMO members to share experiences and lessons learned from such initiatives. If the MCA believe it will add value, the MCA will speak to other IMO members when the trial is underway.</p>



	<p>year of academic study where baseline knowledge of navigation, chartwork, electronic navigational aids and importantly COLREGs has been obtained. There is therefore a strong base on which the simulator training can begin. In stark contrast, the proposed course wishes to see training commenced in Phase 1 of cadet training, where students have no underpinning knowledge.</p> <p>In addition, it is understood that a minimum of 2 weeks of the simulator training under the Dutch Model take place at the National Simulator Training Centre at the Maritime institute Willem Barentsz in Terschelling. There is therefore a high level of consistency and quality management brought into the system of training. Within the UK we are not in this position and there does not appear to be any current proposal for a similar national facility to be established in the UK. It therefore appears that the proposed training in the UK, together with key issues in training, notably duration and quality of sea time, are not comparable with the situation faced by Dutch Authorities and training companies at the respective time period where their sea remission arrangement was put into place. Even with the standardisation and quality management that the Dutch system includes, as stated in section B.2. above, this arrangement is not accepted as meeting the requirements of STCW. As such we do not believe that a comparison to the Dutch Model</p>	
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		is of assistance to, or truly justifies the proposed changes stated by MCA/MNTB.	
Organisation	Honourable Company of Master Mariners	<p>4. Training Standards: Accountability of Training Companies</p> <p>We understand that the proposal arises due to an apparent lack of quality of training and experience gained onboard vessels. The cause of the lack of quality training onboard rests firmly at the hands of those companies that have agreed to sponsor and train cadets. In stating this we firmly recognise that there are a number of training companies that continue to deliver excellent cadet training but unfortunately this does not include all of the companies that commit to the Tonnage Tax and SMarT training regime.</p> <p>It is our understanding that each of the SMarT training companies enter into a “Training Provider Agreement”<sup>4</sup> with the MCA which</p>	<p>The MCA believe this feedback falls outside of the scope of the consultation. However, this feedback will be passed on to the Maritime Skills Commission, Cadet Review Group who are refreshing the Seafarer training system in the UK to allow the well-regarded UK maritime training sector to strengthen its position internationally and meet the future skills demands of the sector. This will include looking at a improving the onboard training experience. Further information can be found here:</p> <p><a href="https://www.maritimeuk.org/priorities/people/skills-commission/projects/seafarer-cadet-review">https://www.maritimeuk.org/priorities/people/skills-commission/projects/seafarer-cadet-review</a>. The MCA and MNTB have been openly discussing simulator training in lieu of some seagoing service with stakeholders for over 3 years.</p>

includes an obligation to provide and monitor the training opportunities necessary for a cadet to meet the requirements for their OOW; namely a commitment to providing 12 months sea time and satisfactory completion of the Training Records Book demonstrating that they have gained practical experience and shown competence of the tasks detailed therein.

Therefore, from the outside it appears that the need for additional simulator time as remission for sea time arises not from the need to improve the quality of the skills of cadets on achieving their OOW CoC, but rather from the failures of training companies in meeting their contractual obligations to provide sea time and an acceptable quality of training onboard. To put it another way, it seems that the failing training companies are being rewarded for their failures. The new obligations on the training companies appear to be benchmarked to the worst performing training companies rather than those that have set a proper standard of training.

The MNTB and MCA have collectively advised that the proposal was originally for additional simulator training to be embedded within the cadet training curriculum and it was on this basis that the course was developed. It was only once the course had been written that the question of seagoing service in lieu was raised by the training providers as a means to finance the training. The course was consequently not conceived with the

		provisions and legislative requirements of the application of STCW at its core. Financing of both the courses and the pilot appears to have been given very little attention in the development of the proposal.	
Organisation	Honourable Company of Master Mariners	<p>5. Training Standards: Loss of onboard experience</p> <p>The proposed training provides navigational training only. In itself this limits the role of an OOW Deck Officer to a navigator only, whereas a Deck Officer is also a cargo officer, a maintenance officer, a safety officer, etc. There is no guidance within the Public Consultation as to whether this training is to count towards 2 of the 6 months bridge time required for an OOW CoC application, or as more general sea time thereby reducing non-navigational experience.</p> <p>The MNTB's own publication<sup>5</sup> on the standards of training mirrors the requirements of STCW and sets out the skills, knowledge and understanding required by a deck cadet which extends to far greater areas than just navigation. For example, cargo operations are part and parcel of critical safety operations where experience is needed in order to ensure the safety of both the vessel and personnel working in and around that vessel. Such operations cannot be actioned safely and effectively in the absence of experience. Experiential opportunity for cargo operations and safe carriage, maintenance, emergency equipment and drills cannot be replicated in a simulator. Removing up to 2 months of</p>	<p>The MCA have now clarified in MSN 1856 Amendment 1 that the 6 months onboard bridge watchkeeping requirement must still be met. In addition, the Training Record Book will ensure other essential tasks are completed. This is a trial project and feedback will be sought from cadets, colleges and companies to ensure training in other areas is not compromised.</p>

		<p>seagoing service from training reduces potential exposure to learning opportunities by a factor of 1/6 for those areas of operation other than navigation.</p> <p>Simply put, knowledge and experience will be greatly reduced and will place those newly qualified OOW officers with reduced sea time at a distinct disadvantage from those persons qualifying with 12 months sea time. It has been well documented that newly qualified officers, despite being advised of a global shortage of qualified seafarers, face considerable difficulty in obtaining a first contract after qualification. It is not possible to see how a CoC with less seagoing experience is going to aid this.</p>	
Organisation	Honourable Company of Master Mariners	<p>6. Approved Cadet Training: MNTB and Overseas Cadet Courses – Discrimination of application: Equality Act 2010</p> <p>The UK has two main routes for cadet training that meet the requirements of STCW Regulation II/1 as an “approved training programme”. These are the MNTB approved cadets who are recruited and trained primarily as part of SMarT funding (“UK Cadets”), and MCA approved overseas collaborative programme cadets (“Overseas Cadets”). The current issue of M-Notice 1856 (M+F), at section 9.6 indicates that for both of these routes a minimum of 12 months sea time is required to be eligible to apply for a Deck Officer of the Watch Certificate of Competency. However, reference is also made to section 3.1, and 3.2 which states that the</p>	<p>The proposal is not discriminatory as it is applicable to all cadets. It is a safety-based approach and is being phased in, so will apply to UK cadets in the first instance. Thereafter, if the trial proves successful, it will apply to all cadets and will be extended to other routes, such as ‘experienced seafarer’. The MCA will include a line in MSN 1856 Amendment 1 to clarify this.</p>

duration of seagoing service for the Overseas Cadets is as per a college letter with the MCA agreeing the duration of the seagoing service required with each of the colleges. It is understood that generally this is set as 15 months seagoing service, but at the present time there is no central reference available for such information.

In the Public Consultation proposal, the simulator training in lieu of seagoing service is only available to the defined UK Cadets, by which it is understood to mean the MNTB approved cadets. There is no reason stated within the Public Consultation as to why this training is intended to not be available for Overseas Cadets (or those applying via the “experienced seafarer route” to which the comments in this section equally apply).

We further understand that it is the MCA’s own opinion that Overseas Cadets (and experienced seafarers) would benefit most greatly from the proposed training, and implementation of the training on their courses would not impact the 12 months minimum STCW seagoing service, given the MCA mandated seagoing service in excess of this period for this group. This further raises questions of why the MNTB and MCA are proposing that this training is only available to UK Cadets.

We observe that such an application of this proposal (and the current practice of requiring Overseas Cadets to obtain sea time in excess of their UK Cadet counterparts when pursuing

		<p>the same professional qualification) would likely be considered as a discriminatory practice of the MCA, and it is questioned whether this would be a permitted practice under the provisions of the Equality Act 2010 or other domestic discrimination legislation. Given the very strong criticism of discrimination levied against the industry in the UK in the employment tribunal case of Ms S Walker v Wallem Shipmanagement Ltd, this certainly does not appear to be an area which should be overlooked so flagrantly as appears to have been done here.</p>	
Organisation	Honourable Company of Master Mariners	<p>7. Future Skills and Simulator Training</p> <p>As part of the Maritime 2050 initiative, it is understood that the UK government has set future skills targets. This includes within the People Route Map<sup>7</sup> the maximisation of the “use of new technologies and ensuring our maritime workforce is prepared for the future”. The focus on the future by the MCA appears in the main to be aligned to autonomous vessels and the implementation of new fuels that comply with the targets for reduced carbon emission.</p> <p>New technologies and new fuels point towards changes to equipment onboard. These changes may well require additional skills, however they will not replace the key underpinning knowledge and skills that every deck officer is required to have with regards to Navigation, Safety, Maintenance and importantly Cargo Care.</p> <p>The vessels of today are themselves complex,</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>

valuable assets which are tasked with continually safely moving a wide array of cargoes, many of which have a value which greatly exceeds the value of the carrying vessel. The skills and professionalism needed to achieve this should not be underestimated and should never be reduced in their importance. In order to maintain our position as a leader in maritime standards, the training standards of British Merchant Navy officers have to focus on these key skills while ensuring added value to training, including adoption of changes where required. There will no doubt be the requirement for additional training in new technologies and systems as these are developed and adopted by the industry.

The use of simulators for training is not indicative of new technologies within the particular framework of Maritime 2050 and the future skills requirements. It is likely that simulators will be developed that reflect new technologies, but those are not the simulators that are the subject of the proposal that arises under the Public Consultation.

Simulators are learning tools and have been adopted in maritime education for decades to deliver short courses such as Bridge Watchkeeping, NARAST, and NAEST. They represent a different approach to teaching in which an industrial setting is replicated.

Simulators are not new technology; they simply represent the main components that a student is likely to see onboard the bridge of a



		<p>vessel. These include items such as ECDIS, ARPA, AIS, a helm, engine and various sensors for speed, depth and meteorological conditions.</p> <p>The inclusion of additional simulator training as per the proposal enhances training, but it does not meet the future skills targets.</p>	
Organisation	Honourable Company of Master Mariners	<p>8. Training Facilities: Availability of Simulators and Availability of suitable instructors</p> <p>It is acknowledged that there is currently no requirement for the simulator training to be a mandatory part of the Deck OOW curriculum. The effect on the available resources must also be considered. At present there are 13 MCA Approved Training Providers (ATP) that run Navigational Aids, Equipment and Simulation Training (NAEST) courses. That is facilities with full mission bridge simulators which would be capable of running the new intended course. Of the ATP's 4 of these providers are the main nautical training colleges which train approximately 95% of all UK Cadet (deck) entrants each academic year.</p> <p>Simulators generally are arranged with a main 270° or 360° bridge with up to 4 additional smaller bridges. For students to gain the most from simulator training a bridge should be manned with no more than 2-3 cadets. This limits a course to an attendance of approx. 12-15 with delivery on the basis that in order for sea time remission to be obtained, the time within the simulator actioning navigational learning should be at a minimum of 7.5h per day.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>

	<p>The annual UK Cadet (deck) intake (excluding the Overseas Cadets) at present is around 500 (averaged over the last 10 years)<sup>9</sup> each of the 4 main colleges would be looking at full utilisation of their simulation facility for around 10 weeks for the Phase 1 simulator course within the Phase 1 schedule. This would possibly be before any baseline knowledge of navigation, chartwork, electronic navigational aids and importantly COLREGs has been obtained. It is therefore questionable as to how a course included within Phase 1, and if all cadets agree to take the course, within the early part of Phase 1, would be effective at teaching any skills at all. When the volume of courses is added into the academic year and given the overlapping Phases for cadet training, it can easily be seen that the capacity for delivering this course to the UK Cadet cohort alone would be limited when consideration is given to the usage of simulation suites for mandatory NAEST (O), NAEST (M) courses, and the contractual commercial courses that the Colleges provide more widely to industry.</p> <p>The Colleges have traditionally struggled to recruit and retain highly qualified lecturers. Many colleges now opt for personnel with OOW or Chief Officer Certificate of Competency rather than a Master Mariner Certificate of Competency, as was previously required. This in turn affects the delivery of simulator courses where lecturers have limited real life experiences upon which to base</p>	
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		<p>training and dedicated instructors are not used for delivery of a course.</p> <p>It has been well documented that the effective outcome of simulation training is directly linked to the competence and consistency of the instructor. The only effective way for the distance travelled by the student to be assessed is for consistency of instruction throughout a simulator course. The proposal does not address the question of resources and in limited form only addresses the standards of instructor for the courses but does not go so far as to determine the consistency of instruction to ensure effective delivery.</p>	
Organisation	Honourable Company of Master Mariners	<p>9. Course Pilot: ensuring STCW standards are verifiable and achieved</p> <p>The draft MSN 1856 (M+F) Amendment 1 (the “M-Notice”) raises the possibility of a pilot for the proposed simulator training course in lieu of seagoing service within Annex F. It is notable that at section 9.3 of the M-Notice it states:</p> <p>“For UK Cadetships first Certificates of Competency, no more than 2 months for training in a full mission bridge simulator will be credited towards the seagoing service requirements of STCW regulations II/1 and section A-II/1 of the Code.”</p> <p>This section surprisingly does not state:</p> <ul style="list-style-type: none"> <li>• At the date of the issue of the M-Notice the bridge simulator courses have not yet been approved;</li> </ul>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>

- That there is a pilot to be completed which is subject to full scrutiny and assessment to verify how standards of training are to be met in accordance with STCW
- That the pilot is expected to take between 3-5 years to be completed
- It is silent as to how the pilot is to be funded to ensure that it is independent

The pilot is described in very loose terms with no defining scope or methodology for the pilot detailed within. It appears to suggest that the MCA are willing to permit seagoing service remission (up to 1 month) for cadets that have completed the simulator training course as administered under the pilot arrangement before the effectiveness of that pilot has been fully assessed. This is fully contrary to the advice provided to the HCMM in October 2020 by the MCA whereby it was advised that no seagoing service in lieu would be approved until the pilot was concluded and this would depend upon the final outcome of that pilot. Assessment of the simulator courses to demonstrate the competencies achieved will require empirical evidence to be drawn together and analysed. The pilot is not described in these terms and it is of great concern that the MNTB and MCA have so far only discussed the outcome of the course in terms of the student experience. While student experience is a useful measure when developing courses generally, this is not a measure that will provide the type of evidence

		<p>required to demonstrate professional competencies.</p> <p>The funding of the pilot has not been addressed within the Public Consultation. With the proposal having a potentially lasting impact on acceptance of UK Certificates of Competency, and that such arrangements will be subject to scrutiny by the IMO within the auditing regime, it is important that the pilot and findings of the pilot are able to withstand criticism. Funding of the pilot is obviously a key aspect to ensuring the pilot is perceived as independent. This is along with the empirical evidence needed to substantiate potential seagoing service remission being conducted by a suitable academic institution that lies outwith of the nautical colleges that will undertake the pilot. Overall, this points to the inclusion in the draft Regulation of provisions regarding the proposal and pilot, which are yet to be fully developed and approved, and may therefore be open to improper application before the full assessment has been concluded.</p>	
Organisation	Honourable Company of Master Mariners	<p>10. Requirement for further public consultation - The views of industry</p> <p>The additional s55A proposed for inclusion in the Merchant Shipping (Standards of Training, Certification and Watchkeeping) Regulations 2021 has drawn our attention for several reasons. It is noted that as per s306 (4) of Merchant Shipping Act 1995 (MSA) the Secretary of State is required to consult with persons who would be affected by regulations,</p>	<p>Section 306 of the Merchant Shipping Act 1995 makes provision for the procedure that must be followed when making secondary legislation under the Act. Section 306(4) of the Merchant Shipping Act 1995 provides for consultation where persons would be affected by the making of the secondary legislation (i.e. regulations, rules or orders) – not where the powers contained in the secondary legislation (which is already made and in force) are exercised. The objective of the consultation is to</p>

	<p>rules or orders before those changes are implemented. The additional s55A appears to provide the Secretary of State powers in contradiction to the provisions of s306 (4) of MSA, whereby changes can be made with regards to equivalents if the Secretary of State is satisfied of these arrangements.</p> <p>The possible impact of the proposal for simulator training in lieu of sea time, as can be appreciated from the above response, is far reaching. It seems incredible that where this or similar changes that may impact the acceptability of United Kingdom Certificates of Competency due to the application of STCW by way of equivalents which are not accepted fully as such by the IMO or other Member States, would be reduced to being subject to the Secretary of States opinion alone, without reference to the wider industry.</p> <p>As drafted, we feel that s55A is in breach of the provisions of its primary legislation as per the requirements of s 306 (4) of Merchant Shipping Act 1995.</p> <p>The Public Consultation, as stated above, provides no indication on the way that the pilot is to be run and therefore no indication of whether the findings of the pilot are likely to be fit for purpose. As an industry body we are surprised that the Secretary for State, via the MCA, is seeking not to assess this change properly in the first instance, but to try to include this proposal in law some 3-5 years ahead of when the suitability of such training may be understood.</p>	<p>allow persons potentially affected to provide views on the scope of the powers that are proposed to be contained in the secondary legislation - the point being that there is an opportunity to comment on the proposed power before the secondary legislation is made.</p> <p>Regulation 55A will implement Article IX(1) of the STCW Convention into domestic law – that is, the right to grant equivalences in relation to other educational and training arrangements (including those involving seagoing service), as defined in Article IX(1). This is therefore a right contained in international law and, as it affects individuals, should be implemented in domestic law. The Merchant Shipping Act contains the powers to make this implementation. Please note that Article IX(2) does not require implementation as it is an obligation on States (notification to the IMO).</p>
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	We trust that the inclusion of this proposal with the draft regulation, and M-Notices will be reconsidered.	
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<b>Engineer Officer Small Vessel CoC (yacht, tugs, fishing, workboat etc)</b>			
<b>Please provide feedback on the proposed new targeted Small Vessel Engineering certification route. (Contained in MSN 1904 and MIN 642)</b>			
<b>If this route applies to you as Small Vessel Engineer or an employer of Small Vessel Engineers, how would this change cost and/or benefit you? (Please include any relevant evidence)</b>			
<b>Organisation or Individual</b>	<b>Name of Organisation (If applicable)</b>	<b>Comment</b>	<b>MCA Response</b>
Individual	N/A	No Change.	N/A - Thank you for your response.
Individual	N/A	No response.	N/A - Thank you for your response.
Individual	Second Engineer	MSN 1904 & MIN 642 are very difficult to read with the multiple different grades or certificates, routes, academic qualifications and ways to convert to full CoC's.	The MCA has taken into account consultees responses and suggestions to edit or amend MSN 1904 and MIN 642. This has involved adding enhanced guidance and simplifying certain sections. In addition, the MCA has liaised with industry to explain the guidance and rationale.
Organisation	RNLI	It is something we will monitor to see if there are any benefits to us, however, at this time we will probably not use it.	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	N/A	N/A - Thank you for your response.
Individual	OOW Engineer	I support the Engineer small vessel CoC as a common certification to cover all vessel types that are relevant to the regime rather than having separate CoC for Yachts, Tugs...etc. And the fact that small vessel CoC holder is given a route to upgrade to Merchant Navy unlimited CoC is very important.	N/A - Thank you for your response. The intended flexibility provided by the Small Vessel CoC will aid UK seafarers ability to transition between the different type of vessels and allow for progression.
Organisation	Honourable Company of Master Mariners -	I think it is an excellent idea. Having sailed as mate on coasters that did not require to have a qualified engineer onboard; such a course	N/A - Thank you for your response.



	People and Safety Working Group	could have been an invaluable option in my view.	
Organisation	Humber Maritime College	<p>Clarification of the certification arrangements for Small Vessel Engineers is needed and is welcomed. This will make the provision of training more streamlined and better understood by ship owners and students alike.</p> <p>The training arrangements are likely to maximise distance learning / blended learning as most students will be in employment. 'Earn and Learn'. Regulation should actively encourage distance learning methodology.</p>	N/A - Thank you for your response. The addition of MIN 643 will enable the MCA to update the regulations, along with the MCA approved guides, to reflect future or modernised ways of learning and assessment. These documents will also enable any changes or clarification to the MCA's existing STCW 'Short' and 'Long' courses to be implemented.
Organisation	Shetland Islands Council	Only going to be helpful if ferries are included on the vessel list.	Due to the operational requirements of ferries, these vessels cannot be included within the Small Vessel CoC route.
Organisation	Maritime and Underwater Security Consultants (MUSC)	Not applicable to MUSC's training prospectus.	N/A - Thank you for your response.
Organisation	DFDS A/S (UK)	No opinion.	N/A - Thank you for your response.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MSN 1904, 2.1 While the change of name to EOOW bears no issue with us, perhaps the name 'SV 2nd engineer' should remain as a sub heading in the first box of this table, to avoid any confusion for those who have already embarked upon the SV 2nd engineer route.	<p>From the point that the amending regulations come into force those on the Small Vessel Second Engineer route will be issued with the EOOW CoC to comply with STCW requirements.</p> <p>This will not affect job opportunities as the manning tables will be amended to reflect the same.</p>
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MSN 1904, 3.3 This paragraph has to be read several times in order for it to make sense. Also 'seagoing service' and 'actual seagoing service' are the same thing, surely it should	The MCA has amended this section to clarify the requirements.

		read 'vessel/yacht service', and 'seagoing service'.	
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MSN 1904, 5.8 this entire section is severely lacking in all the information that has been previously included in recent M notices since the introduction of the SV route. The tables are extremely confusing, bearing in mind I pride myself in knowing all the requirements.	MSN 1904, section 5.8 has been amended to improve clarity. Flowcharts from the previous guidance have been added into MIN 642 to provide further clarification and information.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MSN 1904, 10.7 rather than 'EOOW attempt' should this read 'second attempt'?	This drafting error has been amended as suggested.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MSN 1904, Annex A - The table showing the summary of progression through the small vessel route still bears the name 'second engineer' rather than EOOW.	The MCA has amended this section to reflect the correct terminology.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MIN 642 - My first thought is why is this a separate document? It strikes me that all of the information within should be included in MSN 1904. A lot of seafarers will find MSN 1904 and be looking for the conversion routes- it doesn't make sense to me that this isn't part of 1904.	MSN 1904 is designed to explain the regulatory requirements. MIN 642 has been created to provide further guidance that can be adapted over time to supplement MSN 1904. By having the separate MIN it will enable enhanced flexibility and the ability to include future amendments; for example, conversion routes that may be necessary.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	MIN 642 3.1 The section mentions Merchant Navy discharge books specifically. Surely any discharge book is acceptable, as long as it is within the MCA's parameters?	This is a standard generic term for discharge books used throughout the MSNs and MINs. The MCA will accept non-UK discharge books or discharge certificates for this purpose.
Organisation	John Percival Marine Associates/Hoylake Sailing School Ltd.	Where are the conversions from a non-UK COC to the Small Vessel engineering CoC's? Currently a Seafarer holding a non-UK COC can convert to the Yacht COC's, and then convert those to Small Vessel CoC's. Once the yacht	The MCA intends to engage with industry to develop these routes and add them into the MIN 642 when finalised. By having the separate MIN it will enable the flexibility to specify additional information such as conversion routes.

		route is phased out, there will be no entry into the SV route for those engineers holding a non-UK CoC.	
Organisation	Nautilus International	Nautilus supports the proposals as we believe that holders of the small vessel CoC will have more employment opportunities on smaller vessels and have a clear pathway to convert to an unlimited CoC.	N/A - Thank you for your response.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	We welcome the proposal to make the Engineer Officer Small Vessel CoC more flexible across a range of vessels. RMT would like this principle of flexibility to be applied to AB Deck and Engine Room Ratings' Certificates of Proficiency, to ensure that Ratings' STCW qualifications keep up with increased demand for tugs, workboats and other small vessels, in the maritime supply chain servicing offshore renewable energy, North Sea decommissioning and Carbon Capture and Storage for example. We believe that MSN 1862 and MSN 1863 should both be amended to reflect this.	The UK AB certificate can be used on all domestic and offshore vessels. However, some seagoing service must be beyond categorised waters, as is the requirement for the Small Vessel CoC.

**Please provide any positives and challenges you believe may arise from implementing this provision. (Please provide any relevant evidence)**

Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	No response	N/A - Thank you for your response.
Organisation	Shetland Islands Council	Staff development and employment opportunities for local mechanics/engineers. This will help with the ongoing crewing	N/A - Thank you for your response.

		difficulties faced by ferries recruiting and retaining staff in the Islands.	
Organisation	Maritime and Underwater Security Consultants (MUSC)	Not applicable to MUSC's training prospectus.	N/A - Thank you for your response.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	We refer to our previous answer in this section.	Thank you for your response.

### Cost recovery for course approval and re-assessment

#### Short courses

Please indicate which example in Annex B is most applicable model to your organisation, if any.

Do the examples in Annex B seem reasonable to short course providers as an estimation of time spent with surveyors conducting course re-approvals, ranging between three to five days?

Organisation or Individual	Name of Organisation (If applicable)	Example Letter	Comment	MCA Response
Individual	N/A	Example A	Yes	N/A - Thank you for your response.
Organisation	Teekay Gas	None of the models apply to our organization	Yes, appears reasonable.	N/A - Thank you for your response.
Organisation	Scottish Maritime Academy at North East Scotland College	Example C	We are a small centre in the northeast of Scotland but have a wide course portfolio aligned to the needs of the local industry including fishing, workboat, standby ERRV. The proposed charges will have a detrimental impact on our centre as we do <b>not</b> have high volumes of students/large numbers of course dates pa which means it will be challenging to recover the additional fees. However, we are the main provider of these courses in the northeast of Scotland and require to retain the full portfolio to support clients on fishing courses, those converting tickets and deck cadets. Additional costs will have to be passed on to delegates which may impact on retention and new entrants to the fishing industry in particular.	The fees must be applied from the date the amending regulations come into force. The MCA are planning to publish a Marine Information Note to detail further guidance on the proposed charging structure to help providers plan and build it into their cost models.

			I would hope that the revised course approval and re-assessment cost recovery is introduced in a phased basis to help mitigate the negative impact on income and additional budget required. The College budget for 21-22 has already been set and does not include the additional MCA fees proposed.	
Individual	N/A	N/A	No response.	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	N/A	It is expensive, though less expensive than other approvals such as OPITO etc. Why in this day and age, with new technology does it have to be attending surveyors for refresher approvals. Initially yes to see the facility etc. The use of webcams to see the course running and an ongoing check up of delegate feedback and assessments should prove that the courses are running effectively. Don't make it complicated	<p>In accordance with STCW Convention regulation I/6 and I/8, the MCA is responsible for the approval and ongoing monitoring of training providers and courses to ensure the required minimum standards are upheld.</p> <p>The new guidance does enable the MCA to undertake certain audits and reapprovals in a reduced timeframe or alternative capacity (using modern technology such as video links). However, the ongoing monitoring process is a mandatory requirement and must be in line with STCW requirements.</p>
Individual	Second Engineer	N/A	Not able to find Annex B as there was no details of which M notice this was referring to.	Annex B related to the 'Annex B: Course approval and re-assessment cost recovery examples' located within the 'STCW Consultation Document' (pages 24 to 28).
Organisation	Bluewater Yachting (Palma)	N/A	Outside of the UK	N/A - Thank you for your response.
Organisation	RNLI	Example D	As a charity providing this training to our own crews as part of their training to enable us to provide a lifesaving service free of charge as part of the UK and Irish	The fees must be applied from the date the amending regulations come into force. The MCA are planning to publish a Marine Information Note to detail further guidance

			Governments' commitments under SOLAS, we would hope to be able to reach an agreement with the MCA to minimise any costs.	on the proposed charging structure to help providers plan and build it into their cost models.
Organisation	Honourable Company of Master Mariners	N/A	Yes, so long as there is a certainty that audits and approvals are to be undertaken by professional technical surveyors, and not by administration personnel within the MCA.	As detailed in MSN 1856 Annex G, MSN 1857 Annex D, MSN 1865 Annex F and MIN 643: the MCA's 'Short' and 'Long' Course approval audits will always include trained/qualified technical staff (MCA Surveyors).
Organisation	Blackpool and the Fylde College	Example A	Yes	Thank you for your response.
Organisation	The Nautical Institute - Members	N/A	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Example A	N/A	N/A - Thank you for your response.
Organisation	Humber Maritime College	Example A	<p>The costs outlined are very high. The hourly rate indicated is £147 per hour charged for surveyor time. This would seem to be the same hourly rate charged to ship owners for survey work and is inappropriate for training establishments which have an entirely different funding and cost model.</p> <p>A typical rate per hour for training and auditing internally might be £30 per hour.</p>	<p>The £147 fee is in accordance with the Surveyor fee as per the published fee regulations:  <a href="https://www.gov.uk/government/publications/maritime-coastguard-agency-mca-fees">https://www.gov.uk/government/publications/maritime-coastguard-agency-mca-fees</a></p> <p>Further guidance and clarification on the MCA's charging procedure will be provided to MCA Surveyors and MCA approved training providers to set out the guidelines and expected charges to ensure a consistent approach and process.</p>

			<p>This discrepancy is based on the current requirement for surveyors to undertake the work. We would suggest that a separate team at MCA is formed to provide this service and who would have experience in the delivery and auditing of training; the cost model would then be more appropriate and be more effective. It will lower time pressures on the surveyors.</p>	
Organisation	Humber Maritime College	Example A	<p>The consultation provides no service level agreement from the MCA to the client. The charged approval and auditing process should be a mutual one where the training establishment can expect a certain level of service from the MCA. Open ended response times should be changed if charging is to go ahead. Currently the experience is that course approvals take far too long; this due to limited surveyor time.</p>	<p>The MCA notes the points raised. However, this is a customer service issue outside of the scope of the amending regulations. The MCA will pass on this feedback to the relevant teams and Marine Offices.</p>
Organisation	Humber Maritime College	Example A	<p>The application of charging will have a major impact on Humber Maritime College; any implementation needs to be undertaken after due consideration of alternate pricing structures and over a period of time.</p> <p>Colleges will have to pass on these additional costs as we are unable to absorb these internally. Any charges from the MCA therefore add to the already high cost of UK maritime training. The Treasury needs to consider the effect of charging in</p>	<p>The MCA note the implementation costs and pricing that will arise.</p> <p>As noted in the consultation document, in line with the Treasury's publication, 'Managing Public Money', the MCA must seek to recover the cost for the services it provides (see paragraphs 6.2.4 and 6.3.5 to 6.3.7). If the MCA is unable to recover the costs of these processes, then the cost would need to be placed on the taxpayer to ensure the approval process can continue to function effectively. As a party to the Convention, the</p>



			<p>this area when we are also asked to expand UK maritime training in a competitive overseas market under Maritime 2050.</p>	<p>UK is required to ensure the provision of qualified training providers offering Convention compliant training. These courses are essential to ensure UK seafarers are adequately trained in safety critical competencies.</p>
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Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>It is not clear which example applies to our SSO/CSO and PDSD courses. A combined CSO/ SSO course is 5 days duration, but it is not known whether a surveyor carrying out re-approval would be required on site for 1 day to check the QMS etc, or 5 days to sit in on the entire course. Our SSO and CSO courses were first approved in 2003.</p>	<p>No. This is not an efficient use of the surveyor's time. The desk top approval has already been done and the list of trainers approved. Once the initial audit of the site and QMS has been done there should be no further need to revisit as no further insight into the quality of the courses can be gained. Far better that snap inspections are carried out based on the training provider's published course schedule. Unannounced inspections are much more likely to reveal any non- conformities and ensure that training providers will always need to comply with the requirements. This would also free up the Surveyor's time and allow him or her to carry out inspections when convenient to the MCA's requirement.</p> <p>For example, the MCA has been unable to provide a surveyor to reassess our courses and we have had two extensions so far and it seems likely that we will have to be granted a further extension at the end of October as there has been no response to our request for a surveyor to assess MUSC's combined CSO/SSO.</p>	<p>If the MCA are unable to implement the course approval charging structure, then the cost would need to be placed on the taxpayer to ensure the approval process could continue to function effectively and training providers could continue to be approved by the MCA.</p> <p>'Short' and 'Long' courses and qualifications are essential to ensuring UK CoC holders are adequately trained in safety critical courses and competently understand the underpinning knowledge to serve at sea. Moreover, it is a key duty of the UK as a signatory of the STCW Convention to ensure the training and standards meet the requirements of STCW Code. In accordance with STCW Convention Regulation I/6 and I/8, the MCA is responsible for the approval and ongoing monitoring of the training providers and courses to ensure the required minimum standards are upheld. Without an oversight and auditing process the UK would not be able to approve internationally recognised seafarer safety training and educational courses.</p> <p>As per the short course approval process in MSN 1865 Annex F, the MCA can and may undertake a 'special audit' to monitor/audit a training provider.</p>
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Organisation	DFDS A/S (UK)	N/A	The company benefits both financially and by the inclusion of Company relevant content, buy 'inhouse' training and so it is not unreasonable to make a payment for the approval of courses	N/A - Thank you for your response.
Organisation	Ocean Technologies Group (Videotel and Marlins)	N/A	<p>The course approval examples in Annex B fail to explain how MCA will deal with multiple course approvals requested by an ATP on multiple occasions over a longer time period. It is not the case that all courses are approved in one sitting, thus generating one invoice as the examples suggest.</p> <p>New courses are often added to an existing approved list some months or years later, each one generating new charges for a surveyor to approve them. How this arrangement is dealt with, what remote/onsite visits are then required and what associated costs apply is totally unclear from all the examples given. We would like MCA to provide a means for all approval/re-approval dates to be harmonised to save unnecessary/duplicated visits/audits and expenses, perhaps mere months apart.</p>	<p>The MCA agree with the points raised in this response and the intention is to synchronise the course approvals of an MCA approved training provider with multiple approvals.</p> <p>Alongside the published MSNs and MINs, an updated internal code of practice will be published to MCA technical staff who undertake the auditing and approval process. As part of this guidance, it will include the provision for MCA Surveyors to make 'best use' of time when attending course approvals at a training provider with multiple approvals or at the re-approval stages.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	N/A - As we are not a provider of seafarer training, this is not applicable to RMT.	The examples in Annex B are only based on UK training providers, although it is acknowledged that 'travel requirements and other additional burdens, overseas course approvals may incur further costs' in assessing non-UK training providers. This is important as the Maritime Minister's letter of 1 July 2020 to the Chair	Charging for course approvals will enable the MCA to recover its costs and therefore continue to support overseas maritime training providers and allow UK business and universities to grow through strategic overseas partnerships. Where possible the MCA would look to explore potential

			<p>of the Maritime Skills Commission tasks the MSC with increasing exports of maritime education and training. This has major implications for the MCA's surveyor resources, not just in terms of assessing the delivery of short and long courses in the UK and internationally.</p> <p>Therefore, we think that the proposals on cost recovery for the training provider approval process risks commercialising the MCA to the extent that Surveyor's duties and responsibilities to the UK Ship Register, Port State Control and maritime safety could be neglected. We are concerned about an unforeseen tension between saving taxpayer money and upholding statutory duties which could undermine seafarer training standards, jeopardise maritime safety and damage the UK's international reputation for high standards in seafarer training.</p>	<p>opportunities to promote its high quality training standards across the globe.</p> <p>However, the MCA notes the points raised and can confirm that the MCA's approval process would not come at the detriment to, or endanger, its highly regarded safety standards or its other agreed internationally agreed statutory duties.</p> <p>The MCA would assess each opportunity and pursue a route if it was deemed beneficial to improve maritime education and training. It is expected that charging for course approvals will improve the quality of submissions because there will be an incentive for applicants to keep costs down, reducing the impact on MCA resources. Simultaneously, as MCA approval is very much in demand due to the associated quality of the course, a fair charging structure will also help improve and protect the interests of the seafarers, including safety and career progression, through promoting and protecting high quality training standards.</p>
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Long courses				
'MCA will audit existing long course providers once every three years, for an average of three to five days'. Is this a reasonable expectation when estimating costs for long course providers?				
Organisation or Individual	Name of Organisation (If applicable)	Example Letter	Comment	MCA Response

Individual	N/A - Curriculum Head	Example A	Yes	N/A - Thank you for your response.
Organisation	Teekay Gas	None of the models apply to our organization	Yes, appears reasonable.	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	N/A	No, it's too much and not required.	The MCA will meet with the long course providers to discuss a suitable audit structure taking into account the UK's obligation to meet the requirements of the STCW Convention and Code.
Organisation	Bluewater Yachting (Palma)	N/A	N/A	N/A - Thank you for your response.
Organisation	RNLI	N/A	N/A	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	N/A	Yes, so long as there is a certainty that audits and approvals are to be undertaken by professional technical surveyors, and not by administration personnel within the MCA.	As detailed in MSN 1856 Annex G, MSN 1857 Annex D, MSN 1865 Annex F and MIN 643: the MCA's 'Short' and 'Long' Course approval audits will always include trained/qualified technical staff (MCA Surveyors).
Organisation	Blackpool and the Fylde College	Example A	Reducing the audit period to every 3 years will incur additional costs, which we do not believe provide any additional value. Costs in terms of finance and human resource during audit. Additional indicators could be utilised to inform audit time periods and frequency, such as attendance, retention, completion and achievement on the long programme. External written and oral exam results may also contribute to this risk profile.	Thank you for the points raised. The MCA intends to arrange a formal meeting to discuss the requirements, guidance and process of the 'long' course audits. This will cover and ensure best use of time for MCA Surveyors and MCA approved Colleges.

Organisation	The Nautical Institute - Members	N/A	Yes	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners - People and Safety Working Group	Example A	Yes	Thank you for your response.
Organisation	Humber Maritime College	Example A	<p>The MCA should consider removing themselves from long course auditing in colleges. Long courses are already audited through nationally recognised bodies such as the SQA.</p> <p>MCA surveyors are not trained to evaluate teaching and training methodology and cannot be expected to keep up with such developments.</p>	<p>In accordance with STCW Convention regulation I/6 and I/8, it is directly the responsibility of the Maritime Administration (the MCA) to approve and carry out the ongoing monitoring of the training providers and courses to ensure the required minimum standards are upheld. Therefore, it can only be the Maritime and Coastguard Agency (MCA), on behalf of the Secretary of State and as the Maritime Administration, to undertake these duties. The MCA must have oversight of this process.</p> <p>MCA Surveyors are trained to the IIIC standards, which includes all international conventions.</p> <p>The MCA intends to arrange a formal meeting to discuss the requirements, guidance and process of the long course audits. This will cover and ensure best use of time for MCA Surveyors and MCA approved Colleges.</p>

Organisation	Humber Maritime College	Example A	As an alternative MCA should work with SQA / MNTB centrally to ensure that course content remains fit for purpose. The MSC report on cadet training indicates that this is not being done at present - there is little point auditing for content when the content itself is poor.	<p>In line with the MSC Report, the MCA are currently reviewing the cadet courses and routes. However, it is a STCW Convention requirement that the training outlined in the STCW Code is demonstrated prior to the issue of a UK CoC.</p> <p>A comprehensive review of STCW is due to be undertaken next year (2022) at the IMO, in which the MCA will take part.</p> <p>The MCA also intends to arrange a formal meeting to discuss the requirements, guidance and process of the 'long' course audits. This will cover and ensure best use of time for MCA Surveyors and MCA approved Colleges.</p>
Organisation	DFDS A/S (UK)	N/A	A monitoring process of this length is more or less in line with OFSTED inspection regimes, which are tried and tested so this length of monitoring is reasonable	N/A - Thank you for your response.
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	N/A - As we are not a provider of seafarer training, this is not applicable to RMT.	Again, this is difficult to assess, as the impact of Government policy on the export of seafarer education and training on MCA surveyors is unknown, although it is a clearly stated policy ambition.	N/A - Thank you for your response. Please see the MCA's response to the previous question on this subject.

Best practice assumptions			
The following assumptions, outlined below, are assumed to pose no extra cost to UK business or industry as they are deemed to be best practice or already known by industry:			
Passenger ship training - Referenced/contained in MSN 1866 Amendment 1		Zero cost to UK industry	
The Maritime and Coastguard Agency’s (MCA) approval process for safety training delegated to training providers (in relation to the provision to cancel a training course) - Contained in MSN 1865 (Amendment 1) Annex F, MSN 1866 (Amendment 1) Annex D and MIN 643		Zero cost to UK industry (as zero courses are expected to be cancelled)	
Amendments to the definition of seafarer - i.e. Those who operate privately owned yachts not in commercial use of 24 metres and over to meet the training requirement for a UK Certificate of Competence - Contained in amended regulation 3 of the 2015 Regulations (amended by the proposed amending Regulations)		Zero cost to UK industry (as it is already best practice in the industry for vessels of 24m or over to have an appropriately qualified crew)	
Optional Premium Oral exams - Provision contained in the Merchant Shipping (Fees) Regulations 2018 (as amended by the proposed amending Regulations)		Zero cost to UK industry	
Engineer Officer Small Vessel Certificate of Competency (CoC) - Contained in MSN 1904 and MIN 642		Zero cost to industry + familiarisation costs	
Modernising the UK seafarer training and certification system by allowing some simulator time in lieu of sea time - Contained in MSN 1856 (Amendment 1)		Zero cost to industry + familiarisation costs	
Do you agree with these assumptions? (Please provide relevant detail and evidence)			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response



Organisation	Teekay Gas	<p>There could be negative consequences as a result of replacing sea time with simulator training such as: navigational incidents, quality of cosmetic maintenance, equipment failures, commercial impacts through poor cargo practices, as there is little in the way of impact studies assessing the risk of such a change.</p> <p>There may also be a significant burden on senior officers to increase supervision and training of the junior officers. Such a reduction in sea time could also lead to some companies having to bring in the role of junior third officer or to have a longer handover period for newly promoted officers coming in. It would be much cheaper for shipping companies to spend an extra 3 months as a cadet than as an officer!</p> <p>We are also yet to ascertain if there will be increased college fees to put cadets through such training. With the significant volume it may mean additional simulators and instructors are required to put cadets through in batches.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The use of simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>
Individual	N/A	<p>Reference the Modernising the UK seafarer training and certification system by allowing some simulator time in lieu of sea time: it is not clear how a zero impact has been assessed. There will be Cadet accommodation and travel, simulator provision and instructor provision in multiple centres. Presumably, there will be oversight costs and reporting requirements. All of these bear a cost for which no analysis has been provided.</p>	<p>The MCA acknowledges the points raised. The use of simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>

Individual	Second Engineer	No, simulator training is expensive, especially if you are replacing sea time (low cost), the overall college fees for training a cadet will increase.	<p>The MCA acknowledges the points raised. The use of Simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>
Organisation	RNLI	N/A	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	The simulator time in lieu of sea time proposal, as currently presented, does not provide any benefits to seafarers. The proposal achieves the opposite at unacceptable costs; it increases uncertainty in standards of training, uncertainty in international acceptance of United Kingdom (and Red Ensign) issued Certificates of Competency, implements direct discrimination in application between UK Cadets and Overseas Cadets and appears to attempt to strip away stakeholders rights to have a say in future changes to training and application of STCW. This proposal if implemented in its present form would have a high cost to industry as UK CoC's may lose their reputation, leading to a lower uptake in the employment of UK officers.	Please see the 'Simulator Time' section for the full response to the points raised.

Organisation	Blackpool and the Fylde College	Disagree option iv. (Optional Premium Oral exams) will be zero cost to UK industry, as the colleges will have to pay the premium charge.	The MCA provides the option for overseas training providers to request 'block bookings' for MCA surveyors to attend their facilities and undertake the oral examinations for UK CoCs. This option enables these candidates to undertake oral examinations outside of the central booking system/procedure. Thus, alleviating potential backlogs for UK candidates, while enabling the UK to maintain and raise the standards of its high-quality seafarer training brand worldwide. Therefore, as this cost is for Overseas cadets only, there is zero cost to UK industry.
Organisation	The Nautical Institute - Members	vi - (Modernising the UK seafarer training and certification system by allowing some simulator time in lieu of sea time) - Simulator time should not replace sea experience. I believe the long-term cost is a poorer level of training. Simulators are a fantastic training resource and allow for a lot of sea scenarios to be experienced in a short time, but do not replicate the watch keeping role in any way.	Thank you for your response. The MCA intends to scale back the sea time allowance to up to 1 month maximum. This provision can then be reviewed in the future depending on the effectiveness of the results from the pilot project.  Further, the points that you have highlighted will be considered as part of the pilot project. In addition, guidance will be created and published with input from stakeholders.
Organisation	The Nautical Institute - Members	vi) (Modernising the UK seafarer training and certification system by allowing some simulator time in lieu of sea time) - Potential future costs in unsuitably experienced seafarers resulting in difficulty to gain employment, or potentially worst-case scenario increase in future incidents	The MCA has published an accompanying annex detailing an estimated cost example for this provision.
Organisation	The Nautical Institute - Members	There is no such thing as zero costs when a new regulation is implemented. It depends on who pays.	The MCA acknowledges the points raised. However, the amendments being proposed, such as the simulator time in lieu of sea time or the provision to enable premium oral exams, are non-mandatory changes. It will be up to industry to implement or use the provisions and thus why there is no assumed costs to UK businesses or industry.

			<p>Other provisions are assumed at no extra cost to industry as it is known to already be best practice and implemented within industry.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>
Organisation	Humber Maritime College	<p>It is unlikely that increase to regulatory requirement will have a zero effect on industry in all of these categories.</p> <p>With regard to the costs related to cancelling of courses; it is to be expected that training establishments will need to rework their systems to ensure compliance with updated requirements; this will have a cost.</p>	<p>As it is to be expected that courses should have already been meeting the STCW and MCA requirements then there should be no costs as a result. There are no changes to the standards in the MSNs aside from enhanced guidance. It is also the responsibility of MCA approved training providers to remain up to date with STCW standards.</p> <p>Furthermore, the cost is in relation to the provision to cancel a non-conforming approved course provider and not the process of coming up to standard. As zero courses are expected to be cancelled, the assumption was that there would be zero costs as a result. The MCA has never needed to suspend or cancel a UK course provider in the past and is therefore highly unlikely to do so in the future. The MCA would always aim to work with 'long course' providers before such action became necessary.</p>

Organisation	DFDS A/S (UK)	The assumption that providing a premium orals examination service does not have a cost to the industry is only true if the provision of oral examinations to our (UK) officers is unaffected. It would be incumbent upon the MCA to separately recruit and fund surveyors for this service and that it would be run as a separate entity to the "normal" examination arrangements.	The MCA provides the option for overseas training providers to request 'block bookings' for MCA surveyors to attend their facilities and undertake the oral examinations for UK CoCs. This optional service enables these candidates to undertake oral examinations outside of the central booking system/procedure. Thus, alleviating potential backlogs for UK candidates, while enabling the UK to maintain and raise the standards of its high-quality seafarer training brand worldwide. Therefore, there is zero cost to UK industry and it would not come at a cost or detriment to UK Cadets.
Organisation	Nautilus International	Agree	Thank you for your response.
Organisation	Ocean Technologies Group (Videotel and Marlins)	Point ii. - The Maritime and Coastguard Agency's (MCA) approval process for safety training delegated to training providers (in relation to the provision to cancel a training course - Expecting zero cancellations does not mean the cost is zero. The cost to ATPs for cancelled courses could be significant. This statement is very misleading	As it is to be expected that courses should have already been meeting the STCW and MCA requirements, then there should be no costs as a result. There are no changes to the expected MCA's standards in the MSNs aside from enhanced guidance. It is also the responsibility of MCA approved training providers to remain up to date with STCW standards. Furthermore, the cost is in relation to the provision to cancel a non-conforming approved course provider and not the process of coming up to standard. As zero courses are expected to be cancelled, the assumption was that there would be zero costs as a result. The MCA has never needed to suspend or cancel a UK course provider in the past and is therefore highly unlikely to do so in the future. The MCA would always aim to work with 'long course' providers before such action became necessary.
Organisation	National Union of Rail, Maritime &	As far as we can tell, these are reasonable assumptions to make.	Thank you for your response.

	Transport Workers (RMT)		
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Small and Micro Businesses Questions			
Are you/ do you know of a small and/or micro business(es) who will be disproportionately affected by any of the measures outlined? (If so, please provide relevant detail and evidence)			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual	N/A	No	N/A - Thank you for your response.
Organisation	Southside Marine Ltd	No	N/A - Thank you for your response.
Organisation	Honourable Company of Master Mariners	N/A	N/A - Thank you for your response.
Organisation	Blackpool and the Fylde College	No	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	No	N/A - Thank you for your response.
Organisation	Humber Maritime College	<p>Humber Maritime College is a new maritime training college and is likely to be disproportionately affected by the charging regime; we have a much more limited budget than larger more traditional colleges.</p> <p>In addition we are going through a programme of course development and approval - the charging regime will affect our development disproportionately. Larger more established colleges have all of their courses in place at historically zero MCA cost.</p>	The MCA appreciate the concerns and points submitted. These will be taken into account for the next steps of the MCA's approval and re-assessment charging process.

Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>MUSC has been delivering MCA approved ISPS training since 2003. Indeed, MUSC trained the initial tranche of MCA inspectors and participated in the IMO's technical assistance programme to train IMO representatives throughout West Africa. The decision to ban training providers from delivering courses offsite and overseas has significantly affected the revenue stream formerly enjoyed to a point where it is now barely profitable. We retain the courses as a service to our long-standing clients and the Honourable Company of Master Mariners mentoring programme. We also provide free courses to the cadets sponsored by the HCMM. If we are required to pay nearly £6000 for a five day re-approval process, we will no longer be able to deliver MCA training in the way we have for the past 18 years.</p>	<p>In line with the MSC report and the MCA's strategic plan, the modernisation of seafarer training and process to enable this is being enacted. As per MIN 643 online delivery of certain courses will be enabled and clear guidance to MCA staff will be issued to reflect the modernised way of learning and assessment.</p>
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Unintended consequences			
Do you foresee any unintended consequences of the proposed amendments to the 2015 Regulations that have not been mentioned in this document? (If so, please provide any relevant insight and/or evidence)			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Organisation	Teekay Gas	<p>There could be negative consequences as a result of replacing sea time with simulator training such as: navigational incidents, quality of cosmetic maintenance, equipment failures, commercial impacts through poor cargo practices, as there is little in the way of impact studies assessing the risk of such a change.</p> <p>There may also be a significant burden on senior officers to increase supervision and training of the junior officers. Such a reduction in sea time could also lead to some companies having to bring in the role of junior third officer or to have a longer handover period for newly promoted officers coming in. It would be much cheaper for shipping companies to spend an extra 3 months as a cadet than as an officer!</p> <p>We are also yet to ascertain if there will be increased college fees to put cadets through such training. With the significant volume it may mean additional simulators and instructors are required to put cadets through in batches.</p>	The use of simulator time in lieu will be a non-mandatory option that the sponsoring company can choose to place cadets on. However, the points raised will be considered as part of the pilot project.

Individual	Second Engineer	<p>Item 6) This part of the consultation is confusing, are these approval and re-approval costs new? If they are then these new costs incurred by training providers will be passed directly on to seafarers, so the costs of our training will likely go up.</p> <p>Cadet's effective salary will go down. While at sea cadet outgoings are reduced. By reducing the time at sea and increasing time at college cadets will save less and have to spend more (accommodation, food, etc).</p>	<p>If the MCA are unable to implement the course approval charging structure, then the cost would need to be placed on the taxpayer to ensure the approval process could continue to function effectively and training providers could continue to be approved by the MCA.</p> <p>These organisations can be based in the UK or overseas. Therefore, and in accordance with the government guidelines for "Managing Public Money", the MCA must recover the cost for this service so that it can continue to justify the support for business in the UK and the promotion of the UK training brand overseas. The recovery of these costs will help support the MCA's resource requirements to carry out this statutory function, i.e., the need to justify the recruitment of technical staff which is offset against income.</p> <p>A fair charging structure will also help improve and protect the interests of the seafarers including safety and career progression, through promoting and protecting high quality training standards.</p>
Organisation	Honourable Company of Master Mariners	<p>Please refer to the letter from HCMM dated 05 August 2021, in particular with regards to s55A and the provisions of s306 of the Merchant Shipping Act 1995, plus the possible negative impact on the acceptance of UK certificates by the IMO where the simulator training is implemented in the current proposed form.</p> <p>It appears that the simulator training in lieu of sea time was conceived without proper consideration of the mandatory requirements of STCW.</p>	<p>Please see the 'Simulator Time' section for the full response on the points raised.</p>

Organisation	Blackpool and the Fylde College	No	N/A - Thank you for your response.
Organisation	The Nautical Institute - Members	Bad training providers need to be challenged. This will cost them, and probably deservedly so. More important is the charging for initial approval. This will be a very costly exercise as it is currently free for UK providers.	<p>If the MCA are unable to implement the course approval charging structure, then the cost would need to be placed on the taxpayer to ensure the approval process could continue to function effectively and training providers could continue to be approved by the MCA.</p> <p>In accordance with the government guidelines for “Managing Public Money”, the MCA must recover the cost for this service so that it can continue to justify the support for business in the UK and the promotion of the UK training brand overseas. The recovery of these costs will help support the MCA’s resource requirements to carry out this statutory function, i.e., the need to justify the recruitment of technical staff which is offset against income.</p> <p>It is expected that charging for course approvals will improve the quality of submissions because there will be an incentive for applicants to keep costs down, reducing the impact on MCA resources.</p>
Organisation	The Nautical Institute - Members	Simulators are very expensive experiences and will cost the industry dear. The answer cannot be 'zero cost'!	<p>The costs would only be applicable if the Sponsoring/Training Company chose to take up this option, i.e. cadets can still complete 12 months' seagoing service onboard a vessel. We are not removing this exiting option or mandating that a sponsoring company uses simulator time.</p> <p>The MCA has published an accompanying annex detailing an estimated cost example for this provision.</p>

Organisation	Humber Maritime College	On charging for course approvals - it is likely that courses will, over time, be made shorter, simpler and have more limited content - this to lower approval costs. This may have a detrimental impact on content.	<p>In accordance with STCW Convention regulation I/6 and I/8, it is the direct responsibility of the Maritime Administration (the MCA) to approve and carry out the ongoing monitoring of the training providers and courses to ensure the required minimum standards are upheld. The MCA must have oversight of this process.</p> <p>In line with MCA approved guides, STCW courses must cover the relevant competencies, syllabi and modules. Therefore, the agreed timeframe cannot be 'fluid' or moveable. The courses must remain compliant with international requirements to ensure internationally recognised training and Certificates of Competency.</p>
Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>This response applies solely to Security related courses, CSO, SSO, PDSD and PSA</p> <p>The unintended consequences of these measure will be an upsurge in ISPS training providers seeking approvals from other flag administrations such as the Marshall Islands or one of the EU flags. Several have already have, due to the MCA's restrictions on overseas courses.</p> <p>There will also be a number of Training Providers who will apply to get their existing CSO courses approved by the Nautical Institute.</p>	<p>In line with Maritime Skills Commission report and the MCA's strategic plan, the modernisation of seafarer training and the processes to facilitate these changes are contained in the proposed regulations and guidance. The MCA are constantly reviewing this, and will continue to do so, along with the MCA approved guides, to ensure a flexible approach as technology and seafaring evolves. (For example MIN 643 can be updated along with the MCA approved guides to reflect future changes to STCW Short Courses or clarification on MCA 'Short' course policy). Updated guidance will also be available to MCA staff to reflect modernised or alternative methods of learning and assessment for MCA approved courses.</p> <p>The MCA approved guides have been, and will be, amended to provide further information and guidance on course requirements.</p>

Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>The consultation document states that: “The UK is the world leader in training yacht crew... through supporting training providers in overseas yachting hubs...this unique position allows the MCA to support UK business whilst simultaneously raising standards”</p> <p>In reality, the unintended consequences that the current policy of banning training providers from delivering courses overseas has brought about is that many training providers have switched to getting their courses approved by other white list flags whilst less reputable training providers may be tempted to deliver courses outside of MCA oversight, both of which is leading to a lowering of standards.</p> <p>As the UK’s first approved ISPS Training Provider, MUSC has lost a significant share of our former yacht business to foreign companies. Far from “supporting UK Business” the MCA, an agency which we help fund through UK corporation tax, has effectively stopped us trading and handed our former clients over to foreign businesses that are paying taxes overseas.</p>	<p>In line with Maritime Skills Commission report and the MCA's strategic plan, the modernisation of seafarer training and the processes to facilitate these changes are contained in the proposed regulations and guidance. The MCA are constantly reviewing this, and will continue to do so, along with the MCA approved guides, to ensure a flexible approach as technology and seafaring evolves. (For example MIN 643 can be updated along with the MCA approved guides to reflect future changes to STCW Short Courses or clarification on MCA 'Short' course policy). Updated guidance will also be available to MCA staff to reflect modernised or alternative methods of learning and assessment for MCA approved courses.</p> <p>The current, or previous policy after the amending regulations come into force, have been amended to enable modernised methods of delivery, training and assessment where possible for applicable courses. This will be providing the STCW requirements can be clearly met and demonstrated through the alternative methods.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	See our previous comments on the impact of Government policy on MCA surveyor time.	Please see the MCA's response within the Approval process and re-assessment charging tab.

General Responses & Additional Comments			
Do you have any additional comments to add to the response?			
Organisation or Individual	Name of Organisation (If applicable)	Comment	MCA Response
Individual Seafarer	Second Officer (UK CoC)	Visit in person to cadets in colleges who have completed sea time to gauge their opinions.	<p>Prior to the consultation the MCA has liaised and worked with various UK stakeholders, including Nautical Colleges and Cadets. The MCA have used these opportunities to accumulate a variety of responses as part of its regulatory duties. Published reports can be found on the Gov.uk website such as the STCW Survey Report:</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/986519/STCW_Review_Survey_Summary_Report_-_Navigation_Engineering_ETO.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/986519/STCW_Review_Survey_Summary_Report_-_Navigation_Engineering_ETO.pdf</a></p> <p>and</p> <p><a href="https://www.nautilusint.org/en/news-insight/letters-to-the-editor/calling-on-cadets-to-respond-to-mca-simulator-consultation/">https://www.nautilusint.org/en/news-insight/letters-to-the-editor/calling-on-cadets-to-respond-to-mca-simulator-consultation/</a></p>
Organisation	Bluewater Palma - Training Manager	Understood MIN 594 would also be incorporated into 1904. Issue that the initial service (24m employed and 6m actual) for the registration on the Yacht restricted Route does not feature in MSN 1904.	The MCA have amended MSN 1904 to include these requirements.
Individual	N/A	<p>I feel that STCW should be updated and now is the best time as the SQA is also about to be updated.</p> <p>I believe that the small changes suggested will take a significant time for colleges to implement, however will make a difference to competency in our industry.</p>	A comprehensive review of STCW is due to take place next year (2022) at the IMO and the UK will take part in these discussions.

Organisation	Marine Accident Investigation Branch	Nil response to the entire Consultation.	N/A - Thank you for your response.
Organisation	UK Chamber of Shipping	Nil response to the entire Consultation.	N/A - Thank you for your response.
Individual	N/A	<p>There seemed to be a suggestion that the key safety subject assessments could be delegated to the Colleges.</p> <p>This is a bad idea. The independent assessment by SQA or another authority is key to maintaining standards. If this were not the case, every candidate would pass first time.</p>	<p>The MCA, on behalf of the Secretary of State and as the authorised maritime administration, is the regulatory body authorised to approve, administer and monitor the training and assessment towards a UK CoC.</p> <p>While the MCA may delegate services to other bodies, the MCA must retain oversight of these organisations and any agreement will reflect this fact. Any agreement will not allow for a conflict of interests and they will be in line with international requirements.</p>
Individual	Second Engineer	<p>The term Premium Oral Exam sounds as if this is some sort of fast track or special service, it should have been terms something like block booking fee or international oral exam fee.</p> <p>While I agree with the principle of using simulators so cadets can experience high stress and dangerous situations the proposed use here has a negative impact on the overall learning of a career at sea. If 5-10 days of simulator time really is worth 15-30 days at sea then why not increase the overall training course for cadets to give them 2 weeks of simulator time at college?</p>	<p>The terminology used to describe the premium oral exam fee has been used as it meets the requirements underpinned by the legislation. To use alternative wording would require amendments to the legislation which is not possible or the intention of this package. However, it is important to clarify that the provision is not a fast track service but is an option that can be used by MCA approved providers to guarantee dates and times of oral exam for their candidates.</p> <p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the</p>

			seafarer at least equivalent to the requirements of the Convention.
Individual	OOW Engineer	1) I notice that STCW Small Vessel Certification table given in MIN 524 para 2.1 is different from that given in MSN 1904 para 2.1. In MSN 1904, first row is EOOW on small vessel while in MIN 524 it is Second Engineer. Why the difference? If the intention is to include EOOW in the table of MSN 1904, why not include Second Engineer table below that? In other words the second Engineer row is now missing.	From the point that the amending regulations come into force those on the Small Vessel Second Engineer route will be issued with the EOOW CoC to comply with STCW requirements.  This will not affect the job opportunities as the manning tables will be amended to reflect the same.
Individual	OOW Engineer	2) under para 3 of MIN 524 the paths to get Second Engineer on small vessels is given while this is replaced in MSN 1904 with EOOW on small vessel. Is the Second Engineer on small vessel now completely removed from structure? I understand the MNTB TRB is still called Training Record Book, Second Engineer (less than 9000kW, less than 3000GT), not SV EOOW TRB.	
Individual	OOW Engineer	3) It looks like from above that the Second Engineer SV is now removed, but in MSN 1904	Class 1 and 2 certificates are also known as UK Fishing Certificates of Competency. Class 1 certificates are, on



		<p>para 4.11 heading is Class 1 and 2 Engineering Certificates of Competence. Is this Class 1 and 2 Engineering Fishing Certificates of Competence? Is Class 1 in small vessel CoC Chief Engineer less than 9000 kW, less than 3000 GT? What is Class 2 CoC in the small vessel engineer CoC structure? I was under the impression that CoC for Yachts, Tug and Fishing Vessels will be replaced with the single CoC known as small vessel CoC</p>	<p>request, issued alongside the Small Vessel Chief Engineer less than 9000KW, less than 3000GT, unlimited area CoC providing applicants meet the standards (A period of seagoing service must be served on Fishing vessels).</p> <p>STCW-F is currently being reviewed and is due to be implemented in UK law. The STCW-F regulations and guidance will clarify the certification structure and requirements for engineers on fishing vessels.</p> <p>The MCA has also amended MSN 1904 to clarify the Class 2 Fishing Engineer and Small Vessel CoC requirements.</p>
Individual	OOW Engineer	<p>4) In MIN 642 (which replaces MIN 524), para 7.8.1 Conversion N1 states "If you hold an EOW unlimited, III/1 CoC, to obtain an SV EOW less than 9000 kW, less than 3000 GT CoC, unlimited area you must" but why would someone with EOW unlimited convert his CoC to SV EOW limited kW? Looks like this is a typo since in MIN 524 conversion N1 is from EOW unlimited to SV Second Engineer less than 9000 kW</p>	<p>The MCA has removed this conversion route as it is now redundant.</p>

Individual	OOW Engineer	<p>5) MSN 1860 paragraph 3.3.2 states “The route for existing ETOs ended on 1 January 2020”. Reference is made to STCW 2010 Regulation III/6 paragraph 4. However, I could not see any cut-off date in STCW Convention or Code (refer Regulation I/5 and Article VII) that sets a cut-off date for ending the recognition of past qualification and experience of existing electrical officers. I mean even though the person employed as an electrical officer will need an ETO CoC issued under STCW 2010 by 1 Jan 2017 (or 1 July 2017 for PSC purposes), this does not prevent, as I see, for someone (i.e. an existing electrical officer) to be given an ETO COC based on the recognition of his past qualification and experience even after 1 Jan 2021 (i.e. for example he can be given on July 2021). Therefore, on what basis the cut-off date for existing ETOs is set as 1 January 2020 by MCA?</p>	<p>The MCA enabled a transitional provision for existing ETOs to qualify and obtain a STCW ETO CoC. This five-year transitional period was agreed with industry at the time of the previous regulations implementation in 2015 and has now ended.</p> <p>Officers wishing to apply for a UK STCW ETO CoC must meet the requirements as noted in MSN 1860 (Amendment 1). This requirement has not changed since the regulations were introduced in 2015. A flexible route still exists for experienced ETOs as noted in section 3.3 of MSN 1860 (Amendment 1). I.e. an MCA approved college will create an Action Plan for experienced ETOs.</p>
Individual	OOW Engineer	<p>6) Will MCA accept the latest On Board Training Record Book for Officers in Charge of an Engineering Watch (Engine Cadets) developed and sold by International Chamber of Shipping (ICS) as an equivalent to MNTB Training Record book? ICS website states “The revised Record Book takes full account of the new competence standards stipulated by STCW 2010”. This is not clear from the MSN or MINs. It is clear that the old TRB developed by ISF is not recognized but with regard to the latest ICS TRB, MCA stand is not clear.</p>	<p>The MCA has used the terminology 'MCA approved training record book' to enable some flexibility. Seafarers and candidates enrolling on certain MCA cadetships, or routes with approved training providers will be issued with MCA approved TRBs. If seafarers or candidates wish to use other TRBs they will need to contact the MCA for clarification to ensure the TRB meets the training and competency requirements.</p>

Individual	OOW Engineer	7) MSN 1867 CoC revalidation. In the UK the option to demonstrate continued competence for revalidating an engineer CoC (e.g., EOOW) does not include successfully completing an approved revalidation training course, as the only option for someone who haven't got the required sea service and haven't worked for 30 months in an acceptable occupation, but hold a CoC expired within the last 10 years, is doing an oral exam. However, other administrations allow doing an approved revalidation course as an option as this is allowed in STCW Code A Section A-1/11 paragraph 1.4. Why is this option not considered in the amended MSN?	The MCA does already permit approved colleges to run revalidation courses that lead to the requirement to pass existing written and oral examinations. This is set out in the flow charts of MSN 1861 Amendment 1 (Annex C).
Individual	OOW Engineer	8) Refer MSN 1863 para 2.1 (d). Will MCA recognize ICS TRB for ratings (the latest one)?	The MCA has used the terminology 'MCA approved training record book' to enable some flexibility. Seafarers and candidates enrolling on certain MCA cadetships, or routes with approved training providers will be issued with MCA approved TRBs. If seafarers or candidates wish to use other TRBs they will need to contact the MCA for clarification to ensure the TRB meets the training and competency requirements.
Individual	OOW Engineer	9) Refer MIN 643 para 3.2. Will IMO model courses be regarded as acceptable syllabus?	No, the MCA works with maritime stakeholders to create courses that meet the requirements of STCW and industry.
Individual	OOW Engineer	10) MIN 511 para 4.1 refers to HND and HNC only. But SQA website shows HNC/HND ( <a href="https://www.sqa.org.uk/sqa/79333.html">https://www.sqa.org.uk/sqa/79333.html</a> ) and Advanced cert/Advanced Diploma is marine engineering ( <a href="https://www.sqa.org.uk/sqa/81770.html">https://www.sqa.org.uk/sqa/81770.html</a> ). Does MCA consider HND and Adv Diploma differently? If not, why isn't Adv Diploma mentioned in MIN 511?	The MCA agree this was the intention and the MIN has been amended to clarify.

Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 3, is the word Engineer missing from the heading?	The MCA has amended this drafting error.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 3.2, B, bullet point 2, should it be '36 months' service as a dual-purpose deck hand AND engineer responsible...' instead of '36 months' service as a dual-purpose deck hand OR engineer responsible...'?	The MCA has amended this drafting error.
Organisation	Bluewater Yachting (Palma)	MSN 1904, section 3.2, F, should it read "Pass the MCA oral examination for MEOL SV" instead of "MEOL Y"?	The MCA agrees this was the intention and the MSN has been amended to clarify.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 4.4, The prerequisites for the Yacht Only Route for entry on to the programme are not listed anywhere in in MSN - should be listed here ideally or section 5.8. Also Yacht Restricted Flow Chart from MIN 594 should be added to the Annexes	The MCA has amended section 4.4 to include the 6 months sea service, while under way, as per the 'Y-Route in MIN 594. This will be regardless of whether this service is on a yacht or another type of vessel. Additional guidance has been added to section 5.8 and the flowcharts have been included in MIN 642 to provide further clarification.
Organisation	Bluewater Yachting (Palma)	MSN 1904. Section 4.4.1, "This route is for existing seafarers serving on small vessels. You will not be required to complete the Diploma in Maritime Studies: Small Vessel Engineer. You will be required to register at an MCA approved SV Yacht training provider." Why is this specifically Yacht - should be just SV Training Provider?	The MCA agrees this was the intention and the MSN has been amended to clarify.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 4.4.3, "Once registered on the programme you can (should this read must not can) then be issued a TRB on the request of the MCA approved training provider. You can only complete your TRB tasks and the required additional seagoing service after you have registered at an MCA approved training provider."	The MCA has amended this drafting error.

Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 4.5.1 (Notice of Eligibility), point a, bullet point 2, "2 weeks MCA-approved initial Workshop Skills Training" - Could this be before CoC not before NoE as for Y4? Many crew members do this last in UK at the same time as the Oral.	The NOE is not issued until the required sea service and workshop skills training have been completed. Therefore, the requirement will remain.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 5.8, The tables in this section are somewhat confusing, the flow chart in MIN 594 was more understandable.	The Table in MSN 1904 section 5.8 defines the requirements. However, the MCA has made amendments to improve clarity. The flowcharts will be provided in the associated MIN 642 to provide further clarification and guidance.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Section 10.7, If a candidate fails an oral examination, re-sits may be taken at the following intervals: EOOW attempt - at least 2 weeks after the initial examination; Third attempt - at least 2 weeks after the EOOW attempt; Subsequent attempts - at least 3 months after the previous attempt. Should EOOW read second attempt?	The MCA has amended this drafting error.
Organisation	Bluewater Yachting (Palma)	MSN 1904, Annex A - Flowchart Alternative Route - Something is missing here- presumably AEC?	The MCA has amended this drafting error.
Organisation	Bluewater Yachting (Palma)	MIN 642 - There are no manning regulations?	The MCA is currently working on the manning requirements and guidance. This information will be circulated to stakeholders in the near future. Once the requirements have been agreed, they will be added to MIN 642.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 3.1, Certs of discharge are listed as proof of seagoing service but do not list actual days at sea so are not comprehensive and testimonials should be used.	The MCA must see two forms of evidence. The agreed formats are an MCA approved discharge book or discharge certificates, and sea service testimonials. This enables the MCA to cross reference the submitted evidence.

Organisation	Bluewater Yachting (Palma)	MIN 642, Section 4.3 and 4.4, "email: <a href="mailto:iamiexemption@hotmail.co.uk">iamiexemption@hotmail.co.uk</a> " - this email address is being phased out and the new email address should be given here - <a href="mailto:exemption@iami.org.uk">exemption@iami.org.uk</a>	The MIN has been amended to reflect the updated contact details.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 5, "5.1 An exemption from the AEC parts I and II may be available under the Accreditation of Prior Learning (APL) carried out by an MCA-approved training provider. The provider will map across your previous training and experience against the syllabus to see if an exemption can be granted. 5.2 The College Action Plan Letter format for AEC part I and II exemptions can be found in Annex A." Should this include also IAMI, not only ATPs?	The MCA has amended the MIN to include an 'MCA approved organisation, MCA Approved SV Training provider or an MCA approved training provider'. A footnote has also been added to state that the approved organisation will be subject to the MCA approval and audit process. Any individuals carrying out this service must be qualified in accordance with STCW regulations I/6 and I/8.
Organisation	Bluewater Yachting (Palma)	MIN 642 , Section 6, "6.1 An exemption for Workshop Skills training will be available under the APL carried out by an MCA approved training provider or MCA recognised assessor. They will map across your previous training and experience against the syllabus to see if an exemption can be granted. 6.2 The College Action Plan Letter format for Workshop Skills Training exemptions can be found in Annex A." Should this include also IAMI, not only ATPs?	
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7, Somewhere it should state that 1.5 day rule does not apply to conversions	The MCA has amended section 7 to note that the 1.5 rule does not apply to conversions.

Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.1, point a, "Complete 6 months' seagoing service on yachts of at least 350 kW while holding Y4 CoC OR pass the MCA oral examination for EOW on Small Vessels less than 9000 kW, less than 3000 GT, unlimited area, III/2 MCA oral examination;" Should this be SEAGOING OR ACTUAL SEAGOING?	The MCA has clarified the terminology to reflect the correct definitions. The term seagoing service will need to be used in line with STCW. However the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the documents.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.2, point a, "Complete 6 months' seagoing service on yachts of at least 350 kW while holding a Y4 CoC;" Should this be SEAGOING OR ACTUAL SEAGOING?	
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.2, point b, "Successfully complete the MCA approved module and pass the corresponding MCA professional examination for Chief Engineer Statutory and Operational Requirements;" Also SV Auxiliary Equipment Part 2 if SV Aux 1 was used for Y4 rather than the old Y Auxiliary Equipment?	The MCA has added the requirement as suggested. Auxiliary Equipment 2 will be required unless the previous Y Auxiliary Equipment course was undertaken. A footnote has been added to clarify that the candidate will need to evidence this when applying.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.3, point a, "While holding a Y4 CoC complete 12 months' seagoing service on yacht of at least 350 kW which includes a minimum of 6 months' service on yachts of 750 kW or more in power;" Should this be SEAGOING OR ACTUAL SEAGOING?	The MCA has clarified the terminology to reflect the correct definitions. The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the documents.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.3, point a, "While holding a Y4 CoC complete 12 months' seagoing service on yacht of at least 350 kW which includes a minimum of 6 months' service on yachts of 750 kW or more in power;" The 'minimum of 6 months service on yachts of	The MCA has clarified the guidance to state the requirement for 6 months service on yachts can be completed at any point, not since holding a Y4 Certificate.

		750kW or more in power' can be at any point, does not need to be since the Y4 - this needs to be stated more clearly.	
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.3, point b, Also SV Auxiliary Equipment Part 2 if SV Aux 1 was used for Y4 rather than the old Y Auxiliary Equipment.	The MCA has added the requirement as suggested. Auxiliary Equipment 2 will be required unless the previous Y Auxiliary Equipment course was undertaken. A footnote has been added to clarify that the candidate will need to evidence this when applying.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.5, point a, "Complete 12 months' seagoing service while holding Y4 CoC, or 6 months' seagoing service while holding Y3 CoC. 6 months of this seagoing service must be completed on yachts of at least 750 kW and the remainder on yachts of 350 kW or more in power;" Should this be SEAGOING OR ACTUAL SEAGOING?	The MCA has clarified the terminology to reflect the correct definitions. The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the documents.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.5, point a, "Complete 12 months' seagoing service while holding Y4 CoC, or 6 months' seagoing service while holding Y3 CoC. 6 months of this seagoing service must be completed on yachts of at least 750 kW and the remainder on yachts of 350 kW or more in power;" The '6 months of this seagoing service must be completed on yachts of at least 750 kW' can be at any point, does not need to be since the Y4 - this needs to be stated more clearly.	The MCA has clarified the guidance to state the requirement for 6 months service on yachts can be completed at any point, not since holding a Y3 or Y4 Certificate.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.6, point a, "Complete 3 months seagoing service on yacht of at least 750 kW while holding Y2 CoC;"	The MCA has clarified the terminology to reflect the correct definitions. The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within



		Should this be SEAGOING OR ACTUAL SEAGOING?	the MSNs. A consistent approach will be used throughout the documents.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.3.6, point a, "Complete 3 months seagoing service on yacht of at least 750 kW while holding Y2 CoC;" Can the service on 750kW be prior to Y2, as with Y4-SV Chief?	The MCA requires the sea service to be completed after the certificate has been obtained. This is to ensure the seafarer has gained the relevant experience prior to the full unrestricted CoC being issued. Previously, to obtain a Y1 CoC it included the requirement to hold a Y2 CoC and obtain the necessary sea service.
Organisation	Bluewater Yachting (Palma)	MIN 642, Section 7.8, Any conversion options from non-UK EOOW?	The MCA intends to engage with industry to develop these routes and add them into MIN 642 when finalised. Having a separate MIN will enable greater flexibility to add future amendments. For example, conversion routes that may be necessary.
Organisation	Blackpool and the Fylde College	Following student feedback, could further consideration be given to standardising oral examinations and providing the facility to record such examinations? This would enable monitoring and support any appeal process.	The MCA are in the process of reviewing the online oral exams and this will be considered. The oral exam process is mandated by the Surveyors/Examiners Code of Practice and guidance. All MCA Examiners must undertake the required training and meet the qualifying requirements in order to undertake oral examinations.
Organisation	Blackpool and the Fylde College	Has consideration been given for a premium service for NOE applications, as current turnaround time causes issues for cadets returning for phase 5?	The MCA notes the points raised. The UK Seafarer Services branch is currently undergoing a transformation project to ensure the services provided are modernised and as efficient as possible. However, this point is a customer service issue which is outside of the scope of the amending regulations. The MCA will pass on this feedback to the relevant teams and Marine Offices.
Organisation	Blackpool and the Fylde College	Could further consideration around issuing a NOE earlier in the seafarer's journey be appropriate to expedite the process? Evidence of sea time to be scrutinised at issue of CoC. This	The evidence submitted by applicants for an NOE is required as part of the process to enable the MCA to check the cadets training and competency for the oral examination itself. The new online oral service, due to

		would avoid delays and backlog to secure exam slots.	<p>be implemented as part of the ongoing transformation project, is intended to help resolve issues and delays in this area.</p> <p>The MCA will pass on this feedback to the relevant teams and Marine Offices.</p>
Organisation	Blackpool and the Fylde College	Alternatively could seafarers be registered at phase one, short courses added as they progress, so when they submit NOE application the process is much more streamlined as not all documentations has to be checked in such a short space of time?	The MCA notes the points raised. The UK Seafarer Services branch is currently undergoing a transformation project to ensure the services provided are modernised and as efficient as possible. However, this point is outside of the scope of the amending regulations. The MCA will pass on this feedback to the relevant teams.
Organisation	Blackpool and the Fylde College	All checks to be enforced at time of issuing CoC, as oppose to NOE.	<p>The evidence submitted by applicants for an NOE is required as part of the process to enable the MCA to check the cadets training and competency for the oral examination itself. The new online oral service, due to be implemented as part of the ongoing transformation project, is intended to help resolve issues and delays in this area.</p> <p>The MCA will pass on this feedback to the relevant teams and Marine Offices.</p>
Organisation	Blackpool and the Fylde College	Is there room for automation within the process? Could colleges upload details on short course certificates to an MCA portal which would eliminate the need for certificates to be posted and checked by the MCA?	As part of the MCA's transformation process, a review of MCA systems and capabilities are being undertaken. The regulations will allow for continued modernisation by enabling the MCA to utilise future technologies or processes where necessary. This can ensure UK seafarer training remains up to date as well as the processes to support the training and certification procedures. For example, the specific term 'written' exams has been removed in case future examinations are conducted through alternative means.

Organisation	Honourable Company of Master Mariners - People and Safety Working Group	<p>Reduction of seetime - I do not support the use of structured and approved simulator time in lieu of the current seagoing requirements for a deck officer's first CoC. In fact, I think that current the seagoing requirements are too short. It may be sufficient for a deck officer to learn his/her duties as an OOW but not to learn the basic seamanship skills to sufficient level of competency to effectively and safely manage the full scope of deck operations.</p> <p>It will be most detrimental to the profession and the individual.</p>	<p>The MCA acknowledges the response and points raised. However, this is a pilot project that intends to ascertain the effectiveness of the proposal. The MCA would need to be fully satisfied that the level of seagoing service, knowledge, experience, and efficiency provided under the pilot project arrangements enhances the competency of the seafarer at least equivalent to the requirements of the Convention.</p> <p>The points that you have highlighted will be considered as part of the pilot project. Further guidance will be created and published with input from stakeholders.</p>
Organisation	Humber Maritime College	<p>The commentary re non-UK training establishments needs to be clarified. It reads as if there is a cross subsidy going on - MCA supporting non-UK training establishments in some countries.</p> <p>Payments by UK colleges must not go towards funding MCA support for non-UK colleges. If support is required for foreign policy needs, then alternate funding sources need to be found - e.g., development funding - these could also be used to support UK colleges in activities around the world.</p>	<p>The MCA will not support non-UK training establishments with payments or funding from UK colleges or approved training providers. The MCA supports UK colleges and their strategic partnerships, overseas colleges, if they benefit UK seafarer training/PLC. However, the MCA would always aim to recover the costs associated with these ventures.</p>
Organisation	Shetland Islands Council	<p>The &lt;3000gt specified area OOW Coc was removed during to the previous review this has caused a problem for our staff to progress onboard our ferries which are over 500GT. As the CoC used to be issued by request only without additional oral exams, only a tick box on the application, it was only requested by our staff who completed their own NOE's and not by the training officer due to a lack of</p>	<p>The MCA will take into consideration the points raised and pass them to relevant team working on the modernising restricted Deck CoC route.</p>

		<p>understanding and requirements onboard vessels.</p> <p>The benefit of all our staff being able to transfer between vessels is sometimes the only way to keep the lifeline service going to the islands, this has been evidenced during the Covid 19 pandemic.</p> <p>As the vessel we operate within Near coastal and Cat D waters, sea service does not allow for unlimited qualifications and limits the career path and progress. The Specified area does cover the area of operation but does not have a way of increasing the area which causes another issue as there is only limited dry docking facilities on Shetland and our larger vessels are required to go to Scottish mainland for dry docking. Some staff have been issued with a specified area of operation and additional of trips to dry dock without passengers or cargo.</p>	
Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>1. MIN 643 (M) Para 3.2 appears to permit SSO, CSO and PDSD course to be delivered overseas but MSN 1865(M) 4.3 states that peripatetic approval is required. When MUSC applied for this, we were informed that it would not be granted. No reasons were given and the criteria for training providers to be given approval to deliver training overseas has not been made available to us. It is also a concern that there does not appear to be a list of TPs who have been granted peripatetic approval. More transparency is required in this area.</p>	<p>Prior to the amending regulations coming into force, the current policy does not allow the provision for peripatetic approval for certain STCW courses. To modernise MCA approved STCW courses, the MCA has reviewed certain courses and further guidance is detailed in section 3.1 of MIN 643 regarding the approved delivery methods for MCA approved STCW 'short' courses.</p> <p>Details of MCA approved courses can be found on the published 'Approved Training Provider Lists' on gov.uk: <a href="https://www.gov.uk/guidance/mca-approved-training-providers-atp">https://www.gov.uk/guidance/mca-approved-training-providers-atp</a>.</p>
Organisation	Maritime and Underwater	<p>2. Annex B of the consultation document states that</p>	<p>The MCA has amended the 'short' and 'long' course process in MSN 1865 (Amendment 1) Annex F and</p>

	Security Consultants (MUSC)	<p>“For a subsequent approval, the MCA will need to review approximately 50% of the course time”</p> <p>MUSC is currently in the process of seeking re-approval of our SSO and CSO courses and in order to do so have arranged a combined course over 5 days. I understand that the process will involve the surveyor attending throughout the course. Will this now not be necessary?</p>	<p>through MIN 643 to provide further clarity. The new guidance will enable the MCA to undertake certain audits and re-approvals in a reduced timeframe or alternative capacity (using modern technology such as video links). However, the ongoing monitoring process for these courses must be in line with STCW requirements and the MCA must be satisfied that the course still meets the mandatory requirements.</p> <p>Alongside the published MSNs and MINs, an updated internal code of practice and guidance will be published to MCA technical staff who undertake the auditing and approval process. This guidance will include provision for MCA Surveyors to make 'best use' of time when attending course approvals at a training provider with multiple approvals or at the re-approval stages.</p>
Organisation	Maritime and Underwater Security Consultants (MUSC)	<p>3. MSN 1865 (M), Para 2.4 (a), states that the approval process will be carried out against the requirements at 2.3.2 (a-j). These requirements appear to consist of a check on the course administration, QMS and HSE arrangements. As the course material has already been approved at this stage what benefit is there in sitting in on the rest of the course, especially as the surveyor might only see the course delivered by a single one of a number of approved trainers? This appears to be unnecessary and expensive overkill which clearly adds no value to the approval process.</p>	<p>In accordance with STCW Convention regulation I/6 and I/8, the MCA is responsible for the approval and ongoing monitoring of training providers and courses to ensure the required minimum standards are upheld. Without an oversight and auditing process the UK would not be able to approve internationally recognised seafarer safety training and educational courses.</p> <p>The criteria in MSN 1865 (Amendment 1) Annex F is non-exhaustive and the MCA surveyors will audit against this criteria and the STCW requirements.</p>

Organisation	PYA	1. With respect to the regulations regarding yachts, references were being made throughout the MSNs to the term 'sea going service' and other possibly ambiguous terms. As the term 'sea going' could be misinterpreted in yachting - even in the MCA MSNs, it is sometimes used to mean 'on board service' and other times 'actual sea service' - we strongly suggest that the Service Definitions featured in 1858 4.2 (with PYA suggested amendments) are repeated in each of the other notices and the terms used within all notices are consistent throughout.	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and reflected in the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	2. MSN 1904 and MIN 642 largely overlooked previous regulations regarding yachts, such as MIN 594 that was published especially to include the yachting industry. Most of the content in MIN 594 is not reflected in MSN 1904, not even the very helpful flowcharts. We trust this will be included in the next development phase of this project.	<p>The MCA has amended the MSN to include these requirements.</p> <p>The flowchart(s) have also been included in MIN 642 to provide further clarification.</p>
Organisation	PYA	3. The testimonial samples given as Annexes to MSN 1858, 1859 and 1904 are not applicable for yachts. We would like to propose that you include testimonials specifically made for yachts, such as the ones we have attached. Alternatively, we have made comments directly on the testimonials provided in the various MSNs.	<p>The MCA has added a Yacht Sea Service Testimonial template to MIN 642 to assist with yacht applications.</p> <p>The MCA has amended the Annexes within MSN 1859, 1859 and 1904 to include further sections and provide further clarification.</p>
Organisation	PYA	4. As (i) there is a significant overlap between tidal waters Categories C and D; and (ii) there is no clear way to define harbour limits; and (iii) both deck and engineering officers are fully exercising their training and experience at all times during a voyage, then actual sea time	<p>The MCA has updated the definitions within the MSNs to provide further clarification.</p> <p>Seagoing service must be in accordance with the STCW Convention. Vessels must go beyond sheltered and categorised waters for seagoing service to be recognised in line with the STCW Convention.</p>

		should be counted from berth to berth as long as a voyage does include open waters. (See our comments in consultation documents and PYA Addendum).	Therefore, providing the vessel is not operating entirely within categorised waters, and the main generators and auxiliary equipment are running, seagoing service can be counted.
Organisation	PYA	MSN 1858, section 2.1, table Master and OOW, II/2, Code Vessels less than 200 GT, 150 miles from a safe haven and unlimited area - Please insert a link or footnote with definition of 'Code Vessels'.	Code vessels are defined elsewhere and are currently under review. The MCA may look to amend the MSN to reflect the definition once it has been approved.
Organisation	PYA	MSN 1858, section 2.2 - Please insert a link or footnote with definition of 'Code Vessels' for both references of Code Vessels.	
Organisation	PYA	MSN 1858, Section 3.1, point b, "Have completed 6 months' seagoing service while holding an RYA Yachtmaster Offshore or IYT Master of Yachts Limited certificate;" - Currently NO SEA TIME is asked for when one is applying for Master 200, please amend or clarify this.	This will be a requirement and was the intention to ensure the certificates will be internationally recognised.
Organisation	PYA	MSN 1858, Section 3.1, point b, "either: o An RYA shore-based Yachtmaster Ocean course and Yachtmaster Ocean certificate; or o An IYT Master of Yachts Unlimited." Maybe add a footnote: None of these need to be commercially endorsed in support of a Master Code Vessels or OOW 3000 Yachts NOE application	The MCA notes the suggestion; however, there does not need to be a specific reference. Applicants are advised when applying for these certificates.
Organisation	PYA	MSN 1858, Section 3.2, point b, - Currently NO SEA TIME is asked for when one is applying for Master 200, please amend or clarify this.	This will be a requirement and was the intention to ensure the certificates will be internationally recognised.
Organisation	PYA	MSN 1858, Section 3.3, point c, "36 months' onboard yacht service" Please add that there is a 6-month onboard yacht service exemption for college time spent engaged in an MCA approved	This process is incorporated into the MCA's internal processes. Applications using this route will be considered when received by the MCA's processing teams. The Yacht route is due to undergo a review and

		cadetship scheme such as the UKSA Professional Yacht cadetship (PYC) scheme	once underway the MCA will liaise with industry to formally consider proposals such as this.
Organisation	PYA	MSN 1858, Section 3.3, point c, Amend to 'sea service', as per section 4.2, not 'seagoing service'. NOTE: The term 'seagoing' should be amended throughout the whole document, replaced with either 'on board', 'actual sea', or 'sea' service. Seagoing by itself doesn't have a specific clear meaning for people working on Yachts, nor is it defined anywhere in this MSN.	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and any amendments were implemented into the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	MSN 1858, Section 4.1 - Service should be in the deck department onboard yachts and will be reckoned from the date of engagement to the date of discharge. Add "excluding leave and non-working time".	The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and reflected in the applicable MSNs/MINs.
Organisation	PYA	<p>MSN 1858, Section 4.1 - "At least 6 months of the qualifying seagoing service must have been performed within the 5 years immediately preceding the MCA's receipt of your application."</p> <p>There is no definition of 'seagoing service' anywhere in this MSN. Please amend to: 'At least 6 months of the qualifying service...'</p>	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and reflected in the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	MSN 1858, Section 4.2 - These definitions should be consistent throughout all Yacht related documents, so they should match whenever possible also in MSN 1859 and MSN 1904 (in sections for Yachts).	The MCA has reviewed the definitions and proposed amendments to industry to be implemented in the relevant guidance. The definitions have also been made consistent throughout the guidance documents.



		Also, please make sure that the definitions are consistent within the same document (still mentions seagoing service and other terminology not mentioned in the definitions here).	
Organisation	PYA	MSN 1858, Section 4.2 - Onboard yacht service - Please add: "excluding leave and other non-working time"	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and reflected in the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	MSN 1858, Section 4.2 - Actual Sea Service - Please add: A minimum of 4 hours of working duty in 24 hours would count as 1 full day of actual service (as per definition in MSN 1859 for engineers)	The MCA has amended this section as suggested.
Organisation	PYA	MSN 1858, Section 4.2 - Yard Service - add "major" refit, and add "serious" repair and "while in the shipyard". The reason for asking this is because we have crew putting down time when the yacht is just sitting on the dock in the marina, undergoing general day to day maintenance tasks, as shipyard service.	The MCA has reviewed the definitions and proposed amendments to industry to be implemented in the relevant guidance. The definitions have also been made consistent throughout the guidance documents.
Organisation	PYA	MSN 1858, Section 4.4 - "Similar MCA approved service record book" - Should include: "PYA or Nautilus Service Record books as per MCA MIN 543"	The MCA is unable to note other delegated bodies within MSNs, the term "MCA approved service record book" is an overarching term which can include PYA or Nautilus Service Record Books.
Organisation	PYA	MSN 1858, Section 4.4 - "Your testimonials should cover your conduct and ability for the last 12 months of onboard yacht service immediately preceding the date of your application and" -	This section is included within Merchant Navy Sea Service Testimonials and is included within the Yacht Sea Service Testimonials to ensure that any relevant information can be noted, if required.

		Please remove the phrase 'conduct and ability for'. Conduct and ability should not be noted on the testimonials. The same have been removed from UK Discharge Books, but it also makes it difficult for yacht crew who have a bad relationship with captain/owner to obtain a testimonial.	
Organisation	PYA	MSN 1858, Section 4.4 - "application and may also include" - Please change 'may' to 'should'.	The MCA has amended this section to reflect the guidance as suggested.
Organisation	PYA	MSN 1858, Section 9.5, "An NOE provides you with the offer of an MCA oral examination and are valid for period of 5 years from the date of issue." - replace 'are' with 'is'.	The MCA has amended this section to reflect the guidance as suggested.
Organisation	PYA	MSN 1858, Section 4.4 (Annex A in general) - Please see our amended and more up to date testimonial format proposition.	The MCA templates within the MSNs annexes have been amended to reflect certain changes. For example, an additional field for the email address of the signatory for verification has been included.
Organisation	PYA	<p>MSN 1858 Annex A:</p> <ul style="list-style-type: none"> <li>- 'Length' should be added because it is significant if it is less than 15 metres (only on board yacht service is accepted regarding yachts under 15 metres)</li> <li>- Please add a field for 'Areas cruised'. This is important in order to assess the plausibility of the sea time recorded. Not everybody who has a testimonial also has a discharge certificate to show the areas cruised.</li> <li>- "My report on the service of the trainee/rating, during the period stated, is as follows:" - Please refer to our comment above and delete this section re conduct and ability</li> <li>- Part 4 - Please add a field for email address of signatory (for verification)</li> <li>- Please add that the testimonial can signed also by owner or yacht manager as per MIN 543</li> </ul>	

Organisation	PYA	MSN 1858 Annex B: - Gross Tonnage - Please add a field for Load Line Length - Total Time onboard - Please add a field for Leave of Absence - Please add a field for 'email address of signatory' for verification purposes.	
Organisation	PYA	MSN 1859, Please amend "service" to 'on board yacht service'.	This MSN will expire in February 2022. MSN 1859 (Amendment 1) will replace it only until that point, after which it will be replaced by MSN 1904, which will include any relevant clarifications.
Organisation	PYA	MSN 1859, Please amend to 'actual sea service' to ensure the same terms are used in all documents concerning yachts. As explained in our comments in MSN 1858 the term 'seagoing' is ambiguous and not defined anywhere in this or MSN 1858.	
Organisation	PYA	MSN 1859, Section 5 - Please consider adding the definitions of on board yachts service, actual sea service, shipyard service and sea service, as they are in para 4.2 of MSN 1858 to ensure clarity and consistency across the two documents.	
Organisation	PYA	MSN 1859, Section 5.1, "beyond the categorised waters around the coast of the United Kingdom or beyond the harbour limits for waters outside the United Kingdom." - amend to 'proceeding to sea from berth to berth' (meaning harbour waters should be included). Consider applying the same definition of actual sea service as per MSN 1858, but here in the engine department.	The MCA has updated the definitions within the MSNs to provide further clarification. Seagoing service must be in accordance with the STCW Convention. Vessels must go beyond sheltered and categorised waters for seagoing service to be recognised in line with the STCW Convention. Therefore, providing the vessel is not operating entirely within categorised waters, and the main generators and auxiliary equipment are running, seagoing service can be counted.
Organisation	PYA	MSN 1859, Section 5.2 - Please include a definition of what constitutes shipyard time. We get a lot of questions and confusion about this.	The MCA has reviewed the definitions and proposed amendments to industry to be implemented in the

		Vessel at the shipyard in water, out of the water? Doing serious works? Vessel alongside, not at the shipyard, but doing 'shipyard' works? Definition as amended in MSN 1858 could be added here Can "yard time be referred to as Yard service?	relevant guidance. The definitions have also been made consistent throughout the guidance documents.
Organisation	PYA	MSN 1859, Section 5.3 - What is Actual Service? Is this On-board yacht service? Please amend	This MSN will expire in February 2022. MSN 1859 (Amendment 1) will replace it only until that point, after which it will be replaced by MSN 1904, which will include any relevant clarifications.
Organisation	PYA	MSN 1859, Section 5.4 - "Similar MCA approved service record book" - Please add 'PYA Service Record Book, as per MIN 543'	The MCA is unable to note other delegated bodies within MSNs; the term "MCA approved service record book" is an overarching term which can include PYA or Nautilus Service Record Books.
Organisation	PYA	MSN 1859, Section 5.4 - "In exceptional circumstances, a testimonial may be signed by a responsible engineer superintendent of the company. The MCA will not accept self-certificated seagoing service." - This is not relevant for yachts. Perhaps insert similar wording as for Deck officers "a responsible person from the Yacht Management Company such as a company director or yacht manager or owner" as per MIN 543. Should add that if Chief Engineer, the rotational Chief Eng. cannot sign either.	This MSN will expire in February 2022. MSN 1859 (Amendment 1) will replace it only until that point, after which it will be replaced by MSN 1904, which will include any relevant clarifications.
Organisation	PYA	MSN 1859, Section 6 - "b - The MCA will accept certificates issued under the authority of any EU Member State; as well as by any country noted in MIN 643" - There is no MIN 643 in mcga.gov.uk that we could find. Only an irrelevant MGN 643.	MIN 643 is not published as it is part of the amending consultation package.

Organisation	PYA	MSN 1859, Section 8.3 - "Updated lists are available from the MCA website." - Perhaps useful to put a link here.	The MCA has added a link and further guidance as suggested.
Organisation	PYA	MSN 1859, Section 14 - "Fraudulent Certificates and Seagoing Service" - Actual Sea service, sea service or just service?	This MSN will expire in February 2022. MSN 1859 (Amendment 1) will replace it only until that point, after which it will be replaced by MSN 1904, which will include any relevant clarifications.
Organisation	PYA	MSN 1859 - Annex B - Please refer to our proposed testimonial form.	The MCA templates within the MSNs annexes have been amended to reflect certain changes. For example, an additional field for the email address of the signatory for verification has been included.
Organisation	PYA	MSN 1859, Annex B - 'Length' should be added because it is significant if it is less than 15 metres (only on board yacht service is accepted regarding yachts under 15 metres).	
Organisation	PYA	MSN 1859, Annex B - There is NO STANDBY for engineers in yachting and not mentioned anywhere in the MSN	The testimonial has been amended.
Organisation	PYA	MSN 1859, Annex B - According to MSN 1904 new footnote 28 in page 14, engineers can record watchkeeping while not AT SEA, as well. Therefore, there must be a field somewhere on the testimonial for "watchkeeping for not less than 4 hours out of every 24 hours while the vessel was at anchor or standby, providing the vessel was using its own power (vessel's auxiliary power generators)". Otherwise where will the MCA see this?	The information in this footnote will be placed into the Sea Service Testimonial. It is intended that the responsible Chief Engineer will make a professional judgement when signing the testimonial.
Organisation	PYA	MSN 1859, Annex B - Please add a field for 'Areas cruised'. This is important in order to assess the plausibility of the sea time recorded. Not everybody who has a testimonial also has a discharge certificate to show the areas cruised.	The MCA templates within the MSNs annexes have been amended to reflect certain changes. For example, an additional field for the email address of the signatory for verification has been included.

Organisation	PYA	MSN 1859, Annex B, please add a field for email address (for verification).	
Organisation	PYA	MSN 1859, Annex C, It would be useful to include a field for Load Line Length.	
Organisation	PYA	MSN 1859, Annex C, "Total Time Onboard" - It would be useful to add a field for 'Days on Leave'.	
Organisation	PYA	MSN 1859, Annex C, Please add a field for 'Email address of signatory' for verification purposes.	
Organisation	PYA	MSN 1859, Annex D, "The contracted service provider must be separate or demonstrate independence from the training provider offering the underpinning knowledge set out in this section of the Notice." - What does this mean?	The MSN has been clarified to state the "service provider for MCA professional examinations...". This is to ensure that the 'service provider' for the MCA's professional examinations does not have a conflict of interest when undertaking its agreed duties (approving, auditing, reviewing) of a training provider which provides MCA professional examinations.
Organisation	PYA	MSN 1861, Section 3.3, Please delete the term 'seagoing' and use 'Service in the deck department in the capacity ...'	The wording in point 3.3 will remain as it is. It has been used to enable flexibility to enable Yachts Certificate of Competency (CoC) holders to revalidate their CoCs.

Organisation	PYA	<p>MSN 1861, Section 3.3, "15 metres. Yacht service includes a combination of actual sea service, stand-by service and/or yard service. For definitions, please refer to MSN 1857 (Amendment 1)." - These 2 phrases are misleading because on board yacht service of 12 months is accepted for revalidation of yacht CoC, but the definition of yacht service here is erroneous. Please amend to "on board yacht service is time spent signed on a yacht irrespective of the vessel activity excluding leave and other non-working time" in order to align with MSN 1858 and MSN 1859 definitions. Also, the phrase with reference to MSN 1857 and footnote 6, is not regarding yachts, so it should be amended to refer to MSN 1858 and 1859, because it is in the paragraph for yachts. Otherwise please leave a paragraph between that reference and the definition of yacht service.</p>	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p> <p>The drafting error preceding footnote 6 has been amended to the correct MSN references.</p>
Organisation	PYA	<p>MSN 1861, Section 3.5, Please add a paragraph for on board yacht service calculation: "On board yacht service is time spent signed on a yacht irrespective of the vessel activity excluding leave and other non-working time" in order to align with MSN 1858 and MSN 1859 definitions</p>	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	<p>MSN 1861, Annex A "list of acceptable alternative occupations for CoC revalidation" - Could we please also add for 'new built yacht project managers, captains and engineers?</p>	<p>The MCA have added this additional acceptable alternative occupation into the Annex.</p>

		<p>The PYA further clarified the terminology to be added:</p> <ul style="list-style-type: none"> <li>• Engineering and deck officers actively managing yacht repair, refit or construction.</li> </ul>	
Organisation	PYA	MSN 1862, Section 3, point b, please change the word 'sea going service' to 'sea service' in order to correspond with definitions in MSN 1858. This has to be done throughout the whole document regarding the term 'seagoing' where this applies to YACHTS.	Seagoing service is the terminology used in the STCW Convention. The MCA are required to use this terminology to ensure the seafarer and the certificate meets the STCW Convention requirements.
Organisation	PYA	MSN 1862, Section 4.2, point b, does this mean 'onboard yacht service' or 'actual sea service'?	The MSN has been amended to clarify this relates to onboard yacht service.
Organisation	PYA	MSN 1862, Section 5.1, Note, for yachts, does this mean on board service, actual sea service, or both? Please clarify.	This means seagoing service as defined in this MSN. This is an STCW requirement for this certificate.
Organisation	PYA	MSN 1862, Section 6.2, Please clarify that for yachts, 'on board yacht service must be...'.	
Organisation	PYA	MSN 1862, Section 6.2, Seagoing service will be reckoned from the date of engagement to the date of discharge. - Repeated above	The MCA have removed this duplication as suggested.
Organisation	PYA	MSN 1862, Section 6.3, "Onboard Yacht Service" - Please add 'excluding leave and other non-working time' in order to align with MSN 1858.	<p>The MCA have added the wording 'for a Yacht rating certificate' to provide further clarification.</p> <p>The MCA have also clarified this means seagoing service as defined in this MSN. This is an STCW requirement for this certificate.</p>
Organisation	PYA	MSN 1862, Section 6.3, Actual Sea service "associated with a passage" - Please add for yachts: 'Please add: A minimum of 4 hours of working duty in 24 hours would count as 1 full day of actual sea service'.	Amended in line with MSN 1858.
Organisation	PYA	MSN 1862, Section 12 - Could you please publish or send us a list with all authorized entities that can issue a YRC?	The response is not included as part of the consultation amendments.



Organisation	PYA	MSN 1862, Section 12.1, "Templates for Yacht Rating CoP are available in Annexes G and H respectively." - THERE IS NO ANNEX G and H in this document, maybe it was meant to read F and some other annex?	This section has been amended to state Annex F.
Organisation	PYA	MSN 1862, Section 12.1, "Companies wishing to offer this service must be approved by the MCA to conduct yacht or small vessel training in accordance with Annex G of MSN 1858 or Annex D of MSN 1904." - THERE IS NO ANNEX G IN the new MSN 1858, maybe it was meant to read Annex C of MSN 1858?	This section has been amended to state Annex C.
Organisation	PYA	MSN 1862, Section 12.2, point c, Same as above. Please check what Annexes should be referred to.	This section has been amended to reflect the correct Annex references.
Organisation	PYA	MSN 1904, Note it should be read with MIN 642	The MCA has added a line at the beginning of MSN 1904 to reflect the associated MIN 642.
Organisation	PYA	MSN 1904, What happened to MIN 594 for yachts? This MSN should mention if MIN 594 is still valid or not.	The MCA has added a line noting that MSN 1904 replaces MIN 594 as this has now expired. MSN 1904 has been amended to include the applicable sections of MIN 594.
Organisation	PYA	MSN 1904, Section 3, Marine Engine Operator Licence?	This section has been amended to reflect the correct wording.
Organisation	PYA	MSN 1904, Section 3.2, b, point 1, "deck hand or engine" - should be and not or.	Section 3.2 has been amended as suggested.
Organisation	PYA	MSN 1904, Section 3.2, b, point 1 & 2, "6 months must be actual seagoing service in the engineering department; or" - This bullet point b) is conflicting with para 4.4. due to para 3.3. I.e. Para 3.3. says we must refer to entry requirements of 4.4. But in 4.4. only 24 months seagoing service is required, not including 6 months at sea.	The MCA has amended section 4.4 to include the 6 months sea service, while under way, as per the 'Y-Route' in MIN 594. This will be regardless of whether this service is on a yacht or another type of vessel. A flowchart has also been included in MIN 642 to provide further clarification.

Organisation	PYA	MSN 1904, Section 3.2, F, is this supposed to be MEOL SV? The letter Y should not be there	Amended to correct drafting error.
Organisation	PYA	MSN 1904, Section 3.3 - This bullet point b) is conflicting with para 4.4. due to para 3.3. I.e. Para 3.3. says we must refer to entry requirements of 4.4. But in 4.4. only 24 months seagoing service is required, not including 6 months at sea.	The MCA has amended section 4.4 to include the 6 months sea service, while under way, as per the 'Y-Route' in MIN 594. This will be regardless of if this service is on a yacht or another type of vessels. A flowchart has also been included in MIN 642 to provide further clarification.
Organisation	PYA	MSN 1904, Section 4.2, 4.3, 4.4 or 4.5 - 4.5 is NOE, 4.7 is the Alternative Route. Must amend.	Amended to 4.7.
Organisation	PYA	MSN 1904, Section 4.4.1, SV Yacht Training provider - This paragraph is not just for Yachts; therefore it should not say 'SV Yacht Training Provider' it should be just 'SV TP'.	Amended to correct drafting error.
Organisation	PYA	MSN 1904, Section 4.4.2, point a, need to be clear on what is going on when one is serving on yachts. Either to make a note that for yachts, this here is onboard service. (The word 'onboard' was in MIN 594) OR add in page 13 para 5.8 to specify the requirements and not make a reference to para 4.4 (experienced sea farer route for all, full and yacht restricted alike).	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	MSN 1904, Section 4.4.3, should be "you must be issued with a TRB"	Amended to correct drafting error.
Organisation	PYA	MSN 1904. Section 4.4.3, "the required additional seagoing service" - Meaning the one in 4.5.1. below?	The sentence has been amended to provide further clarification.
Organisation	PYA	MSN 1904, Section 4.5.1, point a, 1, "seagoing" - The term 'seagoing' can mean on board or at sea in several points throughout this MSN, therefore it should be clarified at each point. Yachts have on board yacht service, which is from the date of	The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.

		<p>engagement to the date of discharge and actual sea service, which is while vessel is proceeding to sea. Using seagoing service throughout the MSN, in some places meaning on board yacht service and in some, actual sea service, is confusing.</p> <p>Furthermore, according to the table in page 14, to go towards the full CoC, while working on yachts, one will need a further 12 onboard and 8 at watchkeeping. This has been raised since MIN 594 (there, it was 11 months on board and 7.5 at sea, plus workshops) or are workshops included in 12 months on board?</p>	<p>The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p> <p>Section 5 - The requirements noted in the tables have remained the same. Seafarers can obtain 7 months sea service and 1 month Workshop skills training, or 7.5 months sea service with 2 weeks of workshop training to meet the requirements.</p>
Organisation	PYA	MSN 1904, Section 4.5.1, point a, 1, "of 350kW" - amend to "of at least 350kW"	Amended to correct drafting error.
Organisation	PYA	MSN 1904, Section 4.5.1, point a, 2, We think that this should be even after the issuance of the NOE for yachts, as it was in the Y Route	The NOE is not issued until the required sea service and workshop skills training have been completed. Therefore, it will remain as is.
Organisation	PYA	MSN 1904, Section 4.7.7 - seagoing service - clarification needed for the term seagoing	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.</p> <p>The term seagoing service will need to be used in line with STCW. However, the MCA have provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p>
Organisation	PYA	MSN 1904, Section 5.2 and 5.3, "from the date of engagement to the date of discharge/seagoing service must be performed on vessels proceeding to sea" - This, for yachts, gives controversial info, compared to 5.3 below. Yachts have on board yacht service, which is	The term seagoing service will need to be used in line with STCW. However, the MCA has provided a clearer definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.

		from the date of engagement to the date of discharge and actual sea service, which is while vessel is proceeding to sea. Using seagoing service throughout the MSN, in some places meaning on board yacht service and in some, actual sea service, is confusing.	The MCA has provided further guidance within sections 5.2 and 5.3.
Organisation	PYA	MSN 1904, Section 5.3, "beyond the harbour limits" - We strongly advocate that harbour waters are included, for reasons explained in our email message	The MCA has updated the definitions within the MSNs to provide further clarification. Seagoing service must be in accordance with the STCW Convention. Vessels must go beyond sheltered and categorised waters for seagoing service to be recognised in line with the STCW Convention. Therefore, providing the vessel is not operating entirely within categorised waters, and the main generators and auxiliary equipment are running, seagoing service can be counted.
Organisation	PYA	MSN 1904, Section 5.3 - "If you are applying for a Chief Engineer CoC, you may count a total of 25% or 3 months (whichever is least) of the required qualifying service, at lay-up, at maintenance berth, at extended anchorage or in dry dock. This service must be supported by a company letter from the owner or operator detailing your roles and responsibilities during this time period." - Why is there a letter needed? Should this letter be also required for EOOW Engineer above?	It is the responsibility of those candidates who are applying via this route to provide suitable evidence to ensure they meet the requirements of STCW.  The section noting the requirements for EOOW has been amended to reflect the same.
Organisation	PYA	MSN 1904, Section 5.3/5.4 - Need to add a phrase here that says: For yachts sea time requirements please refer to paragraph 5.8, so that everything is clear.	The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided, and any amendments were implemented into the applicable MSNs/MINs.  The term 'seagoing service' will need to be used in line with STCW. However, the MCA has provided a clearer

			<p>definition and explanation within the MSNs. A consistent approach will be used throughout the guidance documents.</p> <p>The MCA has provided further guidance and definitions within section 5.8.</p>
Organisation	PYA	MSN 1904, Section 5.4 - None of tables in para 5.8 mention WATCHKEEPING. Also, nowhere in the tables does it say 6 months (whether actual watchkeeping or 'seagoing').	The sea service time noted within the first table in section 5.8 must be served as 'watchkeeping'. A section has been added to clarify the full 8 or 7 months must be watchkeeping.
Organisation	PYA	MSN 1904, Section 5.4 - To add a phrase here that says: For yachts sea time requirements please refer to tables in para 5.8	Amended as suggested.
Organisation	PYA	MSN 1904, Section 5.8 - Please delete the word 'seagoing'	<p>The term sea going has been removed from the title of section 5.8.</p> <p>The tables in section 5.8 have been amended to provide further clarity, definitions and guidance.</p>
Organisation	PYA	<p>MSN 1904, Section 5.8 - This should be para 5.8.1. and the phrase should start with: "When following the Full Small Vessel CoC Route, the service performed on yachts....".</p> <p>MCA has said before, in MIN 594 para 5, that the 1.5% rule doesn't apply to the Yacht Restricted SV Route, neither to the Y Route Engineers converting. This should be mentioned here, to avoid confusion. Also need to mention that for Y ROUTE Conversion people should refer to MIN 642.</p>	
Organisation	PYA	<p>MSN 1904, Section 5.8 - "Seagoing service testimonials must state the number of days actually spent underway with the main propelling machinery in full use." - The MCA testimonial form must be amended, then, because of footnote 28.</p> <p>Please consider using for yachts the testimonial format we are proposing in our message. If so, a</p>	A template for a yacht testimonial has been added to MIN 642.

		reference to an Annex with it, should be inserted here.	
Organisation	PYA	<p>MSN 1904, Section 5.8 - "you must refer to the entry requirements in the relevant section of this Notice, which for the experienced route will detail sea time requirements for registration." - Please delete that phrase and add a paragraph with entry requirements specifically for people working on yachts, going for Yacht Restricted Route, as per MIN 594; because the entry requirements referred to here, are for the Full CoC.</p> <p>Also, add the phrase that is in MIN 594: The yacht seagoing service rule (1.5x while underway) cannot be used for calculating yacht on board or actual sea service towards a yacht only restricted CoC, or towards the Yacht Conversion Route requirements in MIN 642.</p>	<p>The MCA arranged a meeting to discuss PYA's comments in more details. Further clarification was provided and implemented into the MSN.</p> <p>The reference to the 1.5x rule while underway has been removed from the MSN.</p>
Organisation	PYA	MSN 1904, Section 5.8 - table, SV EOOW Eng Experienced Route "more than 12 months onboard" - In MIN 594 it was 11 months. Is there a reason a month was added? If this is the added workshop, then this needs to be clear here.	<p>The requirements noted in the tables in section 5.8 have remained the same. Seafarers can obtain 7 months sea service and 1 month workshop skills training, or 7.5 months sea service with 2 weeks of workshop training to meet the requirements.</p> <p>The tables have been amended to provide further clarity.</p>
Organisation	PYA	MSN 1904, Section 5.8 - table, SV EOOW Eng Experienced Route "8 (includes up to 1-month workshop)" - In MIN 594 this was 7.5 months. Is there a reason this has become less? (In MIN 594 it was 7.5 plus 4-week workshops)	

Organisation	PYA	MSN 1904, Section 5.8 - "alternatively, engineers working ..." - The word 'Alternatively' is not clear enough, that this is for Yacht Restricted CoC. We think this should be a separate paragraph, para 5.8.2., which will detail all requirements for Yacht Restricted route. Additionally, the flowchart from MIN 594 should be inserted, with a note for watchkeeping, because it was missing when MIN 594 came out.	The table has been amended to clearly note for those working towards the 'yacht restricted route'. A sentence has also been added to replace the word alternatively at the start of the paragraph to further clarify this point as noted below: 'Seagoing service requirements for a restricted Yacht Small Vessel CoC for those working on Yachts: Engineers working on yachts may wish to apply for a SV CoC restricted for use on yachts only. Seagoing service testimonials must state the number of days actually spent underway with the main propelling machinery in full use. The table below details the seagoing service for each CoC, you must refer to the entry requirements in the relevant section of this Notice, which for the experienced route will detail sea time requirements for registration.'
Organisation	PYA	MSN 1904, Section 5.8, you must refer to the entry requirements in the relevant section of this Notice, which for the experienced route will detail sea time requirements for registration. - Again, please delete this phrase and add a paragraph with entry requirements specifically for people working on yachts, going for Yacht Restricted Route, as per MIN 594. Also, add the phrase that is in MIN 594: The yacht seagoing service rule (1.5x while underway) cannot be used for calculating yacht service towards a yacht only restricted CoC or the Yacht Conversion Routes in MIN 642.	The MCA has amended as suggested, noting the route for those working on yachts towards a Small Vessel CoC and those working on yachts applying for a restricted Yacht Small Vessel CoC.  The reference to the 1.5 rule has also been removed.  The term actual sea service has been clarified throughout the document with seagoing service. A definition of seagoing service has also been included to provide clarity.
Organisation	PYA	MSN 1904, Section 5.8 - table 2 - EOOOW Eng Experienced Route 12 months - This in MIN 594 was 11 months. Is there a reason it is augmented? Again, is this including workshops? Can we reinstate the flowchart in MIN 594?	The requirements noted in the tables in section 5.8 have remained the same. Seafarers can obtain 7 months sea service and 1 month Workshop skills training, or 7.5 months sea service with 2 weeks of workshop training to meet the requirements.

			The flowchart has been added to MIN 642 to provide further clarity.
Organisation	PYA	MSN 1904, Section 5.8 - table 2 - EOOOW Eng Experienced Route 5 months (sea service) - Days of watchkeeping are more than at sea? There is no way to assess this, because in the MCA testimonial form, there is only a field for watchkeeping WHILE AT SEA. With MIN 594 we were led to believe that there was no additional watchkeeping required apart from the 4 months underway.	6 months is a STCW minimum requirement. The testimonials have been amended to reflect the necessary information.
Organisation	PYA	MSN 1904, Footnote 28 - HOW will this be recorded? The MCA testimonial form has only a field for watchkeeping while at sea, so one cannot know how many days were at sea and how many days were watchkeeping without being at sea, or anchor, and standby is irrelevant for Yacht Engineers anyway (not mentioned in any MIN, MSN)- The testimonial is not adjusted for WORK ON YACHTS. Thought: Should this footnote 28 be removed altogether and keep the 4 months watchkeeping while at sea?! But then this would not allow engineers working while at anchor to have their seatime recorded. See also comments in the testimonial form in Annex C	The information in this footnote will be placed into the Sea Service Testimonial. It is intended that the responsible Chief Engineer will make a professional judgement when signing the testimonial.
Organisation	PYA	MSN 1904, Section 10.1 - "bring your MCA approved TRB to the MCA Marine Office where you are scheduled to sit the examination. The Examiner may refer to it during the examination." - What if the exams are online?	Section 10.1 has been amended to reflect potential changes to MCA oral exams as noted: '10.1 If you are undertaking the EOOOW Engineer Officer on Small Vessels Oral Examination, prior to the exam you must be able to provide your MCA Training Record Book to the MCA on request.'



Organisation	PYA	MSN 1904, Section 10.7, EOOW attempt - should this be Second attempt?	This drafting error has been amended.
Organisation	PYA	MSN 1904, Annex A - There should be another table here for people working on Yachts, one for going towards Yacht Restricted CoC and one for Full, as per flowchart in Annex A MIN 594.	A Yacht flow chart has been included in the annexes of MIN 642.
Organisation	PYA	MSN 1904, Annex A - Alternative route flowchart - Is this meant to say 'Complete AEC I & II unless...'? The phrase 'OR you can complete your seagoing service as an Assistant Engineer' makes no sense to us. What does this mean?	The MCA has amended this drafting error.
Organisation	PYA	MSN 1904, Annex B, please add a field for Load line length.	The MCA has included these suggestions in the relevant annexes.
Organisation	PYA	MSN 1904, Annex B, please add a field for email address, for verification purposes.	
Organisation	PYA	MSN 1904, Annex C, please add another field for Load line length.	
Organisation	PYA	MSN 1904, Annex C, if footnote 28 (watchkeeping) is going to remain as is in page 14, then there is a need for another field for watchkeeping while not as sea, for YACHTS. We are providing such a template testimonial for yachts in a separate attachment. We were told by the MCA before that there could be a separate testimonial for yachts.	The information in this footnote will be placed into the Sea Service Testimonial. It is intended that the responsible Chief Engineer will make a professional judgement when signing the testimonial.
Organisation	PYA	MSN 1904, Annex C, "This section must be completed" - Please omit this paragraph.	This section is included within Merchant Navy Sea Service Testimonials and is included within the Yacht Sea Service Testimonials to ensure that any relevant information can be noted, if required.
Organisation	PYA	MSN 1904, Annex C, "Engineer Officer Seagoing Service Testimonial for Maritime and Coastguard Agency Company Address/Contact Details" - Same comments as per in the above testimonial form.	The MCA arranged a meeting with the PYA and industry to discuss and clarify the sea service testimonial requirements. Amendments have also been made to the templates within the annexes.

Organisation	PYA	MSN 1904, Annex C, please add a field for email address, for verification purposes.	
Organisation	PYA	MSN 1904, Annex C, could it be added that for service on yachts, the Owner of a yacht or the Yacht Manager may also sign please?	
Organisation	PYA	MIN 642, Section 3.1, Certificates of discharge are not very comprehensive, they only mention days at sea and no other service. Testimonials should be used.	The MCA must see two forms of evidence. The agreed formats are an MCA approved discharge book or discharge certificate, and Sea Service Testimonials. This enables the MCA to cross reference the submitted evidence.
Organisation	PYA	MIN 642, Section 4.3 and 4.4, "email: <a href="mailto:iamiexemption@hotmail.co.uk">iamiexemption@hotmail.co.uk</a> " - this email address is being phased out and the new email address should be given here - <a href="mailto:exemption@iami.org.uk">exemption@iami.org.uk</a>	The MIN has been amended to reflect this information.
Organisation	PYA	MIN 642, Section 5.1, "(APL) Carried out by an..." And IAMI, not just TP	The MCA has amended the MIN to include an 'MCA approved organisation, MCA Approved SV Training provider or an MCA approved training provider'. A footnote has also been added to state that the approved organisation will be subject to the MCA approval and audit process. Any individuals carrying out this service must be qualified in accordance with STCW Regulations I/6 and I/8.
Organisation	PYA	MIN 642, Section 5.2 and 6.2, "The College ..." and IAMI?	
Organisation	PYA	MIN 642, Section 7.2 - Please add a paragraph to mention that the 1.5% rule does not apply to conversions, as per MIN 592.	The reference to the 1.5x rule while underway has been removed from the MIN.
Organisation	PYA	MIN 642, Are there any conversions from foreign, non-UK Engineering CoCs or from MCA CECs, available, like there are on the deck side?	The MCA intends to work with industry to develop these Non-UK Conversion routes and add them into the MIN 642 when finalised. Having the separate MIN will enable greater flexibility and the inclusion of any future amendments, for example conversions that may be necessary.
Organisation	PYA	MIN 642, Section 7.3.1, 7.3.2, 7.3.3, 7.3.5, and 7.3.6, point a, "Complete 6 months' Define if	The term 'actual sea service' has been replaced throughout the document with 'seagoing service'. A

		seagoing means on board yacht service or actual sea service. This should be defined throughout the whole document, because in yachting terms, seagoing is too generic and can be interpreted as either of the two above.	definition of 'seagoing service' has also been included to provide clarity.  The term 'onboard yacht service' has also been included where necessary and a definition included in MSN 1904 and MIN 642.
Organisation	PYA	MIN 642, Section 7.3.5, Point a, "6 months of this seagoing service ..." - Can those 6 months be since Y3, or they can also be since Y4, i.e. at any point?	The MCA has amended the guidance to confirm 6 months of the sea service must be completed since holding a Y4 or Y3 Certificate.
Organisation	PYA	MIN 642, Annex A, this should be: Small Vessel Engineer Officer of the Watch (EOOW) less than 9000kw, less than 3000 GT.	This drafting error has been amended.
Organisation	PYA	MIN 642, Annex A, seagoing service - Please define seagoing. Can it be at sea, or as per footnote 28 page 14 of MSN 1904, or both?	The term actual 'sea service' has been replaced throughout the document with 'seagoing service'. A definition of 'seagoing service' has also been included to provide clarity.  The term 'onboard yacht service' has also been included where necessary and a definition included in MSN 1904 and MIN 642.
Organisation	PYA	MIN 642, Annex A, 'Workshop Skills training' - Could we get a list with Training Providers who do this please?	The MCA are currently working with industry to approve training providers for the Workshop Skills Training course. A list will be published on the relevant gov.uk page when ready.
Organisation	PYA	PYA ADDENDUM Extract from MSN 1859 P. 5.1. "Actual seagoing service Actual seagoing service must be performed on yachts proceeding to sea and in transit. Proceeding to sea means, beyond the categorised waters around the coast of the United Kingdom or beyond the harbour limits for waters outside the United Kingdom. "	The MCA has updated the definitions within the MSNs to provide further clarification. Seagoing service must be in accordance with the STCW Convention. Vessels must go beyond sheltered and categorised waters for seagoing service to be recognised in line with the STCW Convention. Therefore, providing the vessel is not operating entirely within categorised waters, and the main

	<p>With regards to the above, there the regulations require a minimum of four hours on duty with shafts turning for engineers, this requirement combined with such service to be performed outside of UK categorised waters or beyond harbour limits may have the unintended consequence of excluding some relatively short passages of even 6 hours from qualifying time. To give examples: (1) regarding categorised waters: the VTS limits for the ports of Southampton/Portsmouth extend from 7 miles to seaward of the Nab Tower to the Needles Fairway Buoy. Much of this area is estuarial waters, but which can experience considerable swells in SW'ly gales, with overfalls in the Hurd Deep during wind-against tide periods which can damage smaller vessels in extreme conditions. Passage through these confined waters may involve navigating close quarter situations with cruise ships, VLCCs, container vessels, ferries and fleets of sailing yachts.</p> <p>(2) regarding harbour limits for waters outside the United Kingdom: the steaming distance from berth to pier heads in Genoa or Savona or La Spezia, which are busy commercial ports with very large marinas in their confines, may be a few hundred metres to half a mile, depending on departure point. Yachts over 24m loadline are required to remain within defined traffic lanes under the radio supervision of the local port control centre. In the case of Genoa and Savona, even transiting waters many miles to seaward of the port breakwaters requires reporting to and responding to local VTS</p>	<p>generators and auxiliary equipment are running, seagoing service can be counted.</p>
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		<p>requirements.</p> <p>For both deck and engine room personnel, before any voyage begins there are specific pre-departure checks and testing procedures to be carried out, which are an essential part of the professional duties which CoCs are issued for. Berthing and un-berthing are critical times, with no margin for error in crowded harbours. There is little time to react to a failure in propulsion or steering machinery, so even in UMS yachts engineers need to be in the engine room monitoring their machinery and ready to react instantly to any problem. Bridge personnel need to monitor manoeuvring in relation to turning room, wind and/or tide effects, and other craft in the vicinity. In a port and its approaches traffic is denser than in the open sea, lookouts have to be sharp in observing and reporting, and the bridge team has to be ready for any sudden need to detour from the planned route. Deck crew are very active when approaching or leaving a berth, and are on stand-by to drop anchor on approaching or leaving a port.</p> <p>Accordingly, it is argued that actual sea service time should be counted on a berth-to-berth basis, as professional training is being fully exercised at all times during a passage.</p>	
Organisation	Nautilus International	<p>MGN 1858</p> <p>It has been brought to our attention that there is some confusion around the definition of 'actual sea service' in paragraph 4.2 specifically in relation to the definition of time at anchor</p>	<p>The MCA has reviewed the definitions and proposed amendments implemented in the relevant guidance with industry. The definitions have also been made consistent throughout the guidance documents.</p>

		<p>'associated with a passage'. Varying interpretations exist of what constitutes 'associated with a passage' which vary from only including brief periods whilst awaiting canal transit etc to periods of several weeks at the end of a voyage. We believe that the definition in relation to actual sea service and watchkeeping are in urgent need of clarification and, further explanation is required as to how any time at anchorage that cannot be counted is classified e.g. is this stand by time? It has also been pointed out to us that time at anchor is accepted as sea service for those in the merchant fleets there would be questions of fairness if no time at anchor could be counted.</p>	
Organisation	Nautilus International	<p>MSN 1860</p> <p>There is a numbering issue in section 5. Paragraph 1 refers to sea-time requirements in 5.3 but the relevant paragraph is not numbered.</p>	<p>MSN 1860 section 5 has been amended to reflect the correct cross-references.</p>
Organisation	Nautilus International	<p>MSN 1865</p> <p>An issue has been brought to our attention regarding seafarers undertaking refresher training who did not hold the original safety course certificate. When the requirements for refresher training were first introduced, those that did not hold the original certificates because there was no requirement to take those courses when they obtained their CoC were allowed to take the refresher course without taking the full course as MIN 535 listed 'UK CoC' as an acceptable entry qualification. We are now hearing from seafarers who having been allowed onto the course for their first round of refresher training are now being refused entry by colleges.</p>	<p>The MCA notes the point and agrees that certain UK Certificates can be used as evidence towards entry on to refresher training courses. MSN 1865 footnotes 3 and 4 have been amended to refer to MIN 643 section 5.4 for further clarification on what certificates can be accepted towards each refresher course.</p> <p>MIN 643, section 5.4 has been amended to include more comprehensive guidance on what accepted certificates can be used as pre-requisite evidence to enter onto a STCW refresher course.</p>

		<p>This is because the footnotes to the table in paragraph 4.5 of MSN 1865 only refer to NWR or AB certificates as being sufficient for entry onto the refresher course if the original certificate can't be produced. We believe this should be amended to include UK CoC's so as to be consistent with interpretation when the requirements were originally introduced.</p>	
Organisation	Ocean Technologies Group (Videotel and Marlins)	<p>The consultation very clearly sets out the expectations the MCA sets for training providers with repeated references to 'quality' and 'reputation', but fails to articulate what a training provider can expect from the MCA in this regard. Indeed, as one of several Flags we work with, we find the MCA to be extremely slow to work with, citing the following examples:</p> <ul style="list-style-type: none"> <li>• Routine correspondence to the 'STC' email address often takes weeks, sometimes months for MCA to deal with</li> <li>• No formal communication lines between MCA and ATPs are established, other than published literature online. Many ATPs are not members of the organisations 'MCA widely consults with' so routine information is often missed.</li> <li>• Each course approval involves a new surveyor and a new approach with no recollection of earlier discussions or explanations. This duplicates effort and generates unnecessary costs. Auditors with educational rather than shipping knowledge/experience would provide a welcome balance.</li> <li>• Each course approval involves a remote/onsite audit regardless of the existing approval/reapproval status. This must be</li> </ul>	<p>The MCA notes the points raised. However, this is a customer service issue outside of the scope of the amending regulations. The MCA will pass on this feedback to the relevant teams and MCA Marine Offices.</p> <p>MCA surveyors are trained to the IIIC standards, which includes all international conventions. The MCA will take onboard the recommendations.</p> <p>The MCA agrees and its intention, where possible, is to synchronise course approvals of MCA approved training providers where they have multiple approvals. Alongside the published MSNs and MINs, an updated internal code of practice/work instructions will be published internally to MCA technical staff who undertake the auditing and approval process to detail the new procedures. As part of this guidance, it will include the provision for MCA surveyors to make 'best use' of time when attending course approvals at a training provider with multiple approvals.</p>

		<p>harmonised to ensure all approved courses align with the same expiry dates/reapproval audits. The current system is unnecessarily costly, time consuming and inconvenient for all concerned.</p>	
Organisation	Ocean Technologies Group (Videotel and Marlin)	<p>Lastly, and in the spirit of helpfulness, we would encourage MCA to apply some simple customer account management principles, as we do in the commercial world, to ensure ATPs receive a good, consistent service during and between approvals. With the significant tariff of charges proposed for course approvals, this is now even more overdue.</p>	<p>The MCA notes the points raised. However, this is a customer service issue outside of the scope of the amending regulations. The MCA will pass on this feedback and take onboard the customer account management recommendations.</p>
Organisation	United Kingdom Maritime Pilots Association	<p>I think the principal reason for setting the original length of time required for sea going experience would be lost if part was replaced by simulator time. Simulators have a place and are a valuable tool for subsequent training, but not for a candidate's first CoC.</p>	<p>The MCA acknowledges the response and points raised. The points that you have highlighted will be considered as part of the pilot project.</p>
Individual Seafarer	UK CoC Holder (Master)	<p>It is best to avoid referring to MIN in the Regulations or in Merchant Shipping Notices (MSN) as those are published for a very short span of time.</p>	<p>The MINs (642 and 643) contained within the STCW Amendments package will run alongside the MSNs (1865 and 1904) to allow for flexibility and future amendments to be encapsulated. The MINs can be amended with the same number to reflect any changes that may be made.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>References to Ratings References to Cadets in the amended MSNs should be followed by 'or apprentice' where there is overlap between Officer and Rating qualifications, around Efficient Deck Hand qualifications on small vessels, for example. This would be in line with the emphasis on maritime apprenticeships in the Maritime 2050: People Route Map (Paragraph 3.17, in particular).</p>	<p>The terminology of 'Cadet' is the generic industry term that is accepted and used worldwide.</p>



Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>Priority Service</p> <p>RMT share Nautilus International's concerns over the implications of the draft amendments to the Fees Regulations 2018 which give the MCA the option of charging an additional £150 fee to individual seafarers requesting a priority appointment.</p>	<p>The MCA provides the option for overseas training providers to request 'block bookings' for MCA Surveyors to attend their facilities and undertake the oral examinations for UK CoCs. This optional service enables these candidates to undertake oral examinations outside of the central booking system/procedure. Thus, alleviating potential backlogs for UK candidates, while enabling the UK to maintain and raise the standards of its high-quality seafarer training brand worldwide. Therefore, there is zero cost to UK industry and it would not come at cost or detriment to UK Cadets.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>MGN 1858</p> <p>The definition of 'actual sea service' in paragraph 4.2 requires clarification to ensure that time at anchor is included in sea service.</p>	<p>The MCA has reviewed the definitions and proposed amendments to industry to be implemented in the relevant guidance. The definitions have also been made consistent throughout the guidance documents.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>MSN 1865</p> <p>The footnotes to the table in paragraph 4.5 of MSN 1865 only refer to Navigational Watch Rating or AB certificates as being sufficient for entry onto the refresher course if the original safety certificate cannot be produced. We agree with Nautilus International that this should be amended to include UK CoC's to bring it in line with the original requirements in this area.</p>	<p>The MCA notes the point and agrees that certain UK Certificates can be used as evidence towards entry on to refresher training courses. MSN 1865 footnotes 3 and 4 have been amended to refer to MIN 643 section 5.4 for further clarification on what certificates can be accepted towards each refresher course.</p> <p>MIN 643, section 5.4 has been amended to include more comprehensive guidance on what accepted certificates can be used as pre-requisite evidence to enter onto a STCW refresher course.</p>
Organisation	National Union of Rail, Maritime & Transport Workers (RMT)	<p>Seafarer training requirements and emission reductions</p> <p>STCW and domestic legislation are lagging behind technological development. This could jeopardise international and domestic carbon reduction targets, not to mention employment</p>	<p>The points raised have been noted and the MCA agrees the future developments and potential changes need to be considered.</p> <p>STCW is due to undergo a comprehensive review next year (2022), in which discussions the UK will take part.</p>

	<p>and safety considerations in the maritime sector. LNG and battery hybrid vessels are being introduced and ordered for service on Ro-Ro ferry (Including Stena Line's LNG hybrids Estrid, Edda and Embla. P&amp;O Ferries have two electric battery-hybrids on order from Guangzhou Shipyard, China for operation on the Dover-Calais route from 2023. DFDS began operating the LNG hybrid Côte D'Opale between Dover and Calais on 4 August) and other scheduled services from UK ports, yet only the basic regulations on working with low flash point fuels like gas are being updated in this exercise.</p> <p>Ships fuelled by hydrogen are in design, partly funded by the Government's Clean Maritime Demonstration Programme (CMDP) and are due to be trialled next year. A 'hydrogen port' is also planned within the Tees Freeport by 2022. These policies are part of the Prime Minister's Ten-Point Plan for a 'Green Industrial Revolution' and the CMDP is likely to receive further public funding from the Comprehensive Spending Review later this year.</p> <p>Yet the implications of these profound developments for basic seafarer training standards, in STCW and domestically are not being consulted on. The MCA should provide a statement in the explanatory note to the 2021 statutory instrument which sets out the next steps at IMO level for updating the STCW Convention in line with emission reduction targets set for the industry to 2050.</p>	<p>The UK will ensure that future challenges, developments and possibilities for seafarer training are considered to ensure industry can adapt or adopt future proposals.</p> <p>The MCA is working with stakeholders, and will continue to do so, to enable the modernisation of the UK's seafarer training regime and will work with industry to implement any changes when agreed.</p>
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